Public Document Pack

Planning and Transportation Committee

Date: **TUESDAY, 16 NOVEMBER 2021**

Time: **10.30 am**

Venue: **LIVERY HALL - GUILDHALL**

Members:

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

Enquiries: **Gemma Stokley**
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Accessing the virtual public meeting
Members of the public can observe this virtual public meeting at the link below:
https://youtu.be/brtTcuQIUW0
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 26 October 2021.

For Decision
(Pages 5 - 24)

4. **115-123 HOUNDSDITCH LONDON EC3A 7BU**
Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 25 - 250)

5. **RIVERSIDE STRATEGY FOR ADOPTION**
Joint report of the Executive Director Environment and the District Surveyor and Environmental Resilience Director.

For Decision
(Pages 251 - 296)

6. **MANAGEMENT OF CUMULATIVE CONSTRUCTION IMPACTS**
Report of the Executive Director, Environment.

For Information
(Pages 297 - 304)

7. **BUSINESS PLAN 21/22 - Q2**
Report of the Executive Director, Environment.

For Information
(Pages 305 - 314)

8. **PUBLIC MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE**
To receive the draft public minutes of the Streets and Walkways Sub-Committee meeting held on 12 October 2021.

For Information
(Pages 315 - 322)

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

For Information
(Pages 323 - 328)

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

For Information
(Pages 329 - 346)

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

For Information
(Pages 347 - 354)

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

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

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

For Decision

Part 2 - Non-public Agenda

15. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held on 26 October 2021.

For Decision
(Pages 355 - 356)

16. **NON-PUBLIC MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE**
To receive the draft non-public minutes of the Streets and Walkways Sub-Committee meeting held on 12 October 2021.

For Information
(Pages 357 - 358)

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

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

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, 26 October 2021

Minutes of the meeting of the Planning and Transportation Committee held at the Livery Hall - Guildhall on Tuesday, 26 October 2021 at 10.30 am

Present

Members:
Deputy Alastair Moss (Chair)
Oliver Sells QC (Deputy Chairman)
Randall Anderson
Douglas Barrow
Peter Bennett
Mark Bostock
Deputy Keith Bottomley
John Edwards
Marianne Fredericks
Graeme Harrower
Deputy Jamie Ingham Clark
Shravan Joshi
Alderman Alastair King
Alderman Bronek Masojada
Deputy Brian Mooney (Chief Commoner)
Deputy Barbara Newman
Graham Packham
Susan Pearson
Judith Pleasance

Officers:

Angela Roach	-	Assistant Town Clerk
Gwyn Richards	-	Chief Planning Officer & Development Director
David Horkan	-	Environment Department
Deborah Cluett	-	Comptroller & City Solicitor's Dept.
Fleur Francis	-	Comptroller & City Solicitor's Dept.
Ian Hughes	-	Environment Department
Jessica Robinson	-	Environment Department
Ben Eley	-	Environment Department
Lucy Foreman	-	Environment Department
Kerstin Kane	-	Environment Department
Kieran Mackay	-	Environment Department
Samantha Tharme	-	Environment Department
Patrick Hegarty	-	Open Spaces Department
Giles French	-	Town Clerk's Department
Joseph Anstee	-	Town Clerk's Department
Julie Mayer	-	Town Clerk's Department
Shani Annand-Baron	-	Town Clerk's Department

1. **APOLOGIES**

Apologies were received from Deputy Peter Dunphy, John Fletcher, Tracey Graham, Christopher Hayward, Deputy Tom Hoffman, Alderwoman Susan Langley, Deputy Henry Pollard, James de Sausmarez and Alderman Sir David Wootton.

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

There were no declarations.

3. **MINUTES**

A Member advised of a correction to comments they had made in respect of Item 4, wherein the words “just 1% of City’s buildings” should read “only 1% of all listed buildings are Grade 1 Listed and only 4% are Grade II”, as the comments referred to national statistics rather than the City of London specifically.

RESOLVED – That, pending the above amendment, the public minutes and non-public summary of the meeting held on 5 October 2021 were considered and approved as a correct record.

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

The Committee considered a report of the Chief Planning Officer and Development Director regarding Custom House, 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE – specifically, 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. The Committee agreed that the item could be decided in conjunction with the application for Listed Building Consent at Item 4a.

The Chief Planning Officer and Development Director drew the Committee’s attention to the tabled addenda, which advised of corrections to errors within the planning officer’s report, Pan-London and Local Strategic Views, updated recommendations, amended conditions and additional late representations. The Chief Planning Officer and Development Director then advised that the decision in respect of the planning application lay with the Planning Inspectorate, as the application had been appealed on the basis of non-determination.

The Chief Planning Officer and Development Director then introduced the application to Members and presented the officer’s report, informing the Committee about the details of the scheme and its wider implications and outlining the reasons for the officer’s recommendation. The officer’s recommendation was that the Committee resolve to inform the Planning Inspectorate that, were it empowered to determine the application for planning permission, the Committee would have refused permission. The Chief Planning

Officer and Development Director advised that the Committee's decision would be a material consideration in the decision of the Planning Inspectorate.

The Chair invited the registered objectors to address the Committee. Edward Waller, a Conservation Adviser speaking on behalf of the Georgian Group, addressed the Committee in support of the recommendation. The Committee heard that Custom House had a number of points of exceptional significance, also being the earliest purpose-built office building in the City of London. Whilst there had been some rebuilding on the site due to historic bomb damage, many classical arrangements and period features remained. The building was one of exceptional historic and architectural interest, and many aspects of the proposed scheme such as the subdivisions, glass roof and change of use were not desirable for the site. There were three main reasons to support the refusal of the scheme, which were shared by relevant historical and conservation interest groups; objection to the proposed subdivision, objection to the proposals in respect of the roof, and the disturbance of the proposals to the heritage of the site, which must be weighted accordingly in the Committee's considerations. It was said that it was clear the proposals did not meet the criteria for planning permission, and the Committee was urged to refuse the scheme.

Alec Forshaw, on behalf of SAVE Britain's Heritage, also addressed the Committee in support of the recommendation. The Committee heard that Custom House, one of London's great buildings, had a long tradition of public access and was hugely significant in its function as a public building. An initiative like Culture Mile should be considered for the site and surrounding area, and Somerset House and the Tate Modern provided examples of the opportunities available by retaining Custom House as a public building and an amenity for the City of London and the rest of London. SAVE Britain's Heritage were in agreement with the officer's report and with the other objecting interest groups, and felt that the scheme did not provide sufficient public access to the site, with the harm done by the scheme outweighing the benefits. The Committee was urged to support the officer's recommendation and refuse the scheme.

The Chair thanked those speaking in favour for their presentation to the Committee and invited questions from Members, of which there were none. The Chair then invited the applicant to address the Committee. Michael Squire addressed the Committee on behalf of Squire and Partners in objection to the recommendation, with an accompanying PowerPoint presentation and Gareth Fox, of Montagu Evans, also present to respond to questions. The Committee heard that a hotel would be the best use of the current site, which was no longer a public building as it was privately-owned. The impact of the scheme would be negligible in respect of views and features of the building, and the scheme would provide substantial public realm, with an open design giving access to and from the Riverside Walk and through the building, which was of significant public benefit. The proposals were consistent with the guidance on balance between free use and ticketed events set out in the GLA Public London Charter. The provision of a free-to-access museum in the most historic part of the building had been agreed during negotiations, providing further public

benefit in addition to the rooftop pavilion. This was a special scheme, to which the GLA, Port of London Authority and London Borough of Tower Hamlets, amongst other stakeholders, had not objected, and the applicant had sought to reach proper solutions in conjunction with the City of London Corporation.

The Chair thanked those speaking in objection for their presentation to the Committee and invited questions from Members. In response to questions from Members, the applicant advised that they were not sure why agreement with the planning officers had not been reached, as dialogue had been positive and productive. Whilst there were now thirteen reasons for refusal presented, previously access to the riverside had been the only point left to agree, as planning officers had deemed closure of the quayside unacceptable. However, the applicant maintained that the balance of closure and free access was appropriate, with the public benefit outweighing any harm caused by closure. The applicant advised that they were open to discussing the remaining issues further and wanted the opportunity to resolve them. The viability of the hotel was finely balanced and needed the option of the quayside facility in order to be viable. The applicant added that they had listened to the officer's concerns and made concessions, such as the museum, during negotiations.

The Chair then asked that Members move to questions for officers and to debate the application. The Chair opened the debate by advising that he had met the parties involved and regretted the application's unfortunate position. However, it was felt that there had been a failure on the part of the applicant to understand the planning officers' view of the building's capability, and the expectation of diverse and inclusive buildings. The Chair added that in his view, the scheme would render the building insufficiently open and inclusive, and the public benefit did not outweigh the harm of the scheme.

The Deputy Chairman commented that the outcome was disappointing, but the application was not acceptable, as it was not sufficiently respectful of the public nature of the building and the river frontage, to which access was a justified red line. The scheme was contrary to strategic aims to open spaces rather than restrict them, and the application could and should be improved upon. The Deputy Chairman added that he felt great care had been taken by officers to guide the application towards an acceptable solution.

A Member advised that they supported the refusal of the scheme, for the reasons outlined by the relevant historical and conservation interest groups, but expressed their disappointment that the Committee was reduced to offering a view to the Planning Inspectorate rather than determining the application. The Member asked why, if an agreement could not be reached, the application had not been referred to the Committee within the determination timeframe, with a recommendation to refuse the application if necessary.

A Member commented that they supported the point raised on open spaces and did not feel they could vote to close off the Riverside Walk. The Member urged the developer to reconsider the application, adding that there were existing hotels in the area without access to the riverside, indicating that this was not essential for viability. Another Member added that whilst they agreed

with the recommendation, they did not feel there was a general objection to the principle of a hotel on the site. However, this would have to be part of an acceptable scheme.

The Chief Planning Officer and Development Director responded that the non-determination was partly due to the efforts made towards finding a solution with the developer. Officers had requested additional information from the applicant and sought the opportunity to resolve issues. Whilst the application could have been submitted earlier, officers continued to try and reach an agreement on the scheme. The Committee was assured that its resolution would be communicated to the Planning Inspectorate and would be a significant material consideration in determining the application. A Member responded that an extension should have been sought, with the application referred to the Committee if the extension had been declined. The Chair added that planning applications involved negotiations and some applicants would inevitably use their right to appeal to the Planning Inspectorate.

A Member reported that the Ward Members for Billingsgate supported the officer's recommendation but urged both parties to try and resolve the outstanding issues, as whilst there were harmful elements of the scheme, it could potentially include enough public benefit to outweigh them.

In response to a question from a Member, the Chief Planning Officer and Development Director advised that the assertion that there had recently been only one point of objection remaining was not his understanding, adding that all points of concern had been set out in the report. However, officers had always sought to minimise any differences and balance these concerns where necessary.

A Member commented that in their view the public benefits of the scheme did not outweigh the harmful elements of the scheme. Whilst there were already plenty of hotels in the area, Custom House was a unique, historic building with a riverside setting, with which great care should be taken. The Member added that the building could be used more appropriately than conversion to a hotel and advised that they supported the officer's recommendation and reasons for refusal.

A Member advised that they were sympathetic to the concerns regarding process, and it appeared that the deadline had been allowed to pass in an effort to reach a proposal that could be recommended for approval, which was not necessarily the right approach. The Member added that they had concerns about the public offering being compromised or removed at a later stage, and the current proposals sought too many closures of the quayside.

Arising from the discussion, the application was then put to the vote amongst eligible Members, who voted unanimously in favour of the recommendation.

RESOLVED – That the Planning & Transportation Committee:

a) 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 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.

Urban Greening

13. It has not been demonstrated that the proposed development would achieve an adequate urban greening factor or that urban greening has been optimised on this site contrary to London Plan Policy G5, whilst having regard for emerging City Plan Policy OS2; and

b) Delegate authority to the Chief Planning Officer and Development Director to inform the Planning Inspectorate of modified Reasons for which the City Corporation would have refused the permission (were it empowered to determine it) in response to any further information that may be provided by the Applicant.

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

The Committee received a report of the Chief Planning Officer and Development Director in relation to Custom House 20 Lower Thames Street & River Wall, Stairs and Crane, Custom House Quay London EC3R 6EE – Listed Building Consent.

RESOLVED - 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.

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

The Committee considered a report of the Chief Planning Officer and Development Director in respect of 120 Fleet Street London EC4A 2BE; specifically the 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 Chief Planning Officer and Development Director presented the application detailed above and Members noted the following points:

The Daily Express Grade 2 Listed building (located in the Fleet Street Conservation Area) and River Court were illustrated with contextual aerial photographs.

There had been 26 responses in respect of noise and disturbance from construction and the massing of the development, including a representation from the Ward Member for Castle Baynard.

Whilst the various historic institutions had welcomed the improvements to the listed building, they had expressed some concerns about the scale of the development and the impact on the surrounding listed buildings. The Chief Planning Officer and Development Director confirmed that this had been given considerable weight and the GLA had not raised any concerns about the impact on local and strategic views or the local conservation areas.

The application had been assessed in respect of all the relevant local views and the CGI images in the presentation depicted the final proposals. Officers accepted that there would be a small erosion of the view of St Paul's from the Monument and Queen Street, but this was less than substantial and considered to be outweighed by the public benefits; ie – enhancement of the listed Daily Express Building and the public realm, the provision of a public roof garden and cultural destination, new pedestrian routes and a cycle house; thereby promoting healthy streets and active travel. The proposal would deliver cycle parking in excess of the London Plan's requirements and in accordance with the City's Transport Strategy.

The proposal would benefit local residents by relocating the loading bay away from Poppins Court onto Shoe Lane, and use of an offsite consolidation centre would reduce deliveries to 70 a day, all of which would be outside of peak hours. The developer would also fund improvements to the pedestrian environment on Shoe Lane, St Bride Street and Fleet Street, via footway widening, tree planting and other enhancements.

The impact on daylight and sunlight at Poppins Court in terms of BRE standards was considered to be acceptable. The whole life cycle carbon emissions would be lower than the GLA's benchmark and secured by condition, and the development had a very high BREEAM score for sustainability.

The Chair then invited the objectors to speak:

1. **Mr Thom Whall – a resident at Poppins Court**

Mr Whall spoke on behalf of the 2 businesses which would be most affected; ie - the Barbers Shop and Café, which had been trading for 50 years. Members noted that the last major development in the late 1990's had caused considerable disturbance, and the applicant tabled a photograph depicting this.

The businesses were concerned at not having been included in the environmental impact statements, particularly as they are less than 10m away

from the development and rely exclusively on walk-by trade. Members noted that this had been adversely affected during the last major development. The residents were seeking assurance in terms of reasonable breaks in noise, independent checks on air quality and the encroachment of hoardings, and asked whether they would be compensated for reduced earnings. The residents would like to meet regularly with the developers and asked to be sighted on the Construction Management Plan, with assurances that the demolition and building disruptions would be as short as possible.

The residents accepted that an unoccupied building was undesirable but were concerned that a 25 year old building was being demolished. They also questioned whether it was appropriate to replace this with a larger building, in this new era of increased home working.

2. **Mr Christopher Edwards – resident of sovereign House**

Mr Edwards endorsed Mr Whall's representation in terms of the strength of feeling amongst residents. Members noted that some people work from home in the block, and some have young families. There would also be financial consequences for flat owners who would not be able to let or sell their properties. Mr Edwards advised that the building only became fully residential in 1998, and daylight was already being compromised by the structure opposite. Therefore, even a small incremental increase would be significant, given that some bedrooms are only 5 or 6 metres away from the edge of the development.

Mr Edwards was concerned that the Condition Survey was not part of the formal planning report and, to date, residents had only had informal discussions with the agents. Residents also felt that the integrity of an old, vulnerable building was at stake and were unsure as to the remedial steps being taken.

Finally, Mr Edwards was concerned that there had been 3 road traffic deaths in the past 24 months, and felt that additional cyclists should be discouraged.

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.

Mr David Hutton (representing the applicant)

Mr Hutton had been leading the professional team on this development for the past 3 years. Members noted that the developer had originally sought to work with the existing River Court building but concluded that it would miss a regeneration opportunity for the area. Mr Hutton explained that the existing building had been constructed in a different era, for a single occupier, and has limited natural light. The building was obsolete by the time that Goldman Sachs decided to move to new premises and the retail unit remained vacant. Members noted that the developer had maximised every opportunity for enhancing the environment by re-using existing materials and retained over 50% of the existing concrete.

The operational carbon was a quarter of the existing building per sqm, whilst adding a third of new floor space, and the development exceeded GLA targets for being cycle friendly. Mr Hutton was aware of businesses seeking to move to more sustainable buildings, and the development would include temperature regulators and mixed mode ventilation. There would be a single energy system for the entire development.

The Developer had sought to be very respectful of residential neighbours, by relocating the service bay away from Poppins Lane to Shoe Lane, thereby reducing disruption and deliveries. The Developer was also seeking to deliver additional public realm amenity to the area, and to open the former Daily Express Building to the public as a cultural offer.

During the questions and debate, the following points were noted:

Planning officers had looked at providing a larger number of shower cubicles but it would have been necessary to remove the WC facilities. The provision is therefore for 1 in 12, with the recommended standard being 1 in 10. The WC facilities would include both wash basins and hair drying facilities.

The lift has capacity for 400 bikes per hour and the wheeling ramps 1600 per hour, which exceeds the predicted peak hour use.

The turnaround times for lorries was calculated on the basis of 20 minutes stay per delivery but in reality, this is often less. A large number of deliveries would be overnight, with the waste being taken out in the back of empty lorries to the consolidation centre for processing. The SWEPT path analysis was included in the application documents.

In terms of massing, a number of options were considered, including the refurbishment of the existing building, which would have been unsustainable due to its stability core. Although more floor space was being provided in the new development, the benefits of enhanced public amenity were thought to outweigh this.

The developers had met with a number of representatives from the local area, including Ward Members, the Fleet Street Quarter Partnership and Church representatives. As the consultation was underway when the country was emerging from lockdown, a further detailed information pack was circulated in late April 2021 asking for feedback. There were further communications with Sovereign House and Poppins Court residents, together with an invitation to meet with the Design Team and Architect, and a couple of webinars and Microsoft Teams meetings were arranged to discuss how disruptions could be mitigated.

There would be a Condition in respect of the demolition and structural integrity of adjoining properties, together with regular meetings with residents throughout this part of the development. The Conditions would cover a construction management plan and a scheme of protective works. The

Contractor would also be required to sign up to the Considerable Contractor Scheme.

Whilst fully empathising with the disturbances 25 years ago, Members noted that modern building methods can mitigate this and would be covered by Condition.

Officers agreed that Saturday closures could be added to the office Roof Terrace Conditions, in addition to Sundays and Bank Holidays.

It was suggested that the heritage aspirations and greening had been overstated and the statements on sustainability were misleading, as it would take 25 years to pay back the carbon emissions from the development.

The cultural use would be covered by Section 106 agreement and this would require a cultural implementation strategy to secure its delivery, operating model in perpetuity throughout the life of development.

Members had received a further Condition, as a supplement to this agenda, in respect of the height of the rails around the balconies, noting the City's policy on accident and suicide prevention. Officers would be liaising with District Surveyors on the minimum height and full risk assessments would be undertaken. At pre-application stage, the design had been changed and the building reduced in height to minimise the impact on the surrounding heritage assets and views.

There was a request for the Conditions to include a requirement for the Developer to arrange regular agenda-led meetings with resident groups, and to set out a process for this engagement.

The Chair asked if future presentations could include CGI images rather than outlines, as this would give a better perspective of existing consented schemes.

On being put to a vote, 12 voted for, 6 voted against (with no abstentions) and it was **RESOLVED**, that:

1. Planning permission be granted for the above proposal in accordance with the details set out in the attached schedule, subject to the application being 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. 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. The accompanying application for listed building consent be granted (Reference: 21/00524/LBC); and

4. 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

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

The Committee received a report of the Chief Planning Officer and Development Director concerning 120 Fleet Street London EC4A 2BE – Listed Building Consent.

RESOLVED – that:

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.

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

The Committee considered a joint report of the Chief Planning Officer and Development Director and the Comptroller and City Solicitor recommending reasons for refusal to reflect the views of the Committee in resolving, at the 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.

A Member commented that they had reviewed the recording of the meeting and looked carefully at the minutes, and did not feel that the reasons for refusal set out in the report reflected the views of the wider Committee. The Member added that the reasons for refusal should include additional points relating to the balance of public benefit against harm, and the wider impact on other heritage assets such as Holland House. The Chair responded that the report and its recommendation was devised with legal advice, and that his view was that the existing reasons were sufficient.

A Member advised that they wished to propose two amendments. Firstly, it was proposed that "(which harms would not be outweighed by the public benefit of the proposal)" be inserted into the fourth line of the first paragraph, as this reflected the thrust of the refusal as agreed by the Committee, and was consistent with the wording of the second paragraph. Secondly, the Member moved that the reasons for refusal be amended to include a reference to the impact on Holland House and other listed buildings.

The Comptroller and City Solicitor advised that in drafting the reasons for refusal, the first amendment was not included, but was felt to be implied, being more specifically relevant to the second paragraph. However, it could also be included explicitly within the first paragraph. The Chair sought Members' views on the first amendment proposed, and this was agreed. The second amendment was formally moved and seconded, and the Committee proceeded to vote on the second amendment, with two Members voting in favour, seven Members voting against and one abstention. The second amendment was therefore lost. The Committee then agreed the recommendations of the report, with the inclusion of the amendment to the first paragraph.

The Chief Planning Officer and Development Director then advised that a decision on the Tulip was now expected in November. The Committee noted that it may be asked to revisit the decision in some form following this decision, due to additional material considerations.

RESOLVED – That the Planning & Transportation Committee agree:

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 (which harms would not be outweighed by the public benefits of the proposal), 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); and

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 D9w; HC2, and HC3 (protecting the significance of the Tower of London).

7. **RECOVERY TASKFORCE - FINAL REPORT**

The Committee received a report of the Deputy Town Clerk & Chief Executive providing an update on the implementation of the recommendations of the Recovery Taskforce report, Square Mile: Future City, published in April 2021.

A Member commented that it was positive that exercise provision had been added to the Supplementary Planning Document, but added that an adult exercise area should be considered for the Barbican Podium, arising from a project which would create the City of London's largest open space. The addition of accessible public amenity, which had been raised during the public consultation, would more greatly accord with the principles which the City of London Corporation applied to developers in the planning process, and a lack of public amenity would need to be taken into account when considering any planning application for the project.

Members commented that the project needed to aim for the widest possible benefit rather than being specific to residents of the Barbican Estate, and that it was hoped the application put to Committee would demonstrate broad consultation, with due consideration given to the provision of an adult exercise area. Permeability and access should also be key aims of the project, and Members urged officers to work collaboratively towards bringing the project to the Committee. The Chief Planning Officer and Development Director advised that whilst feedback would be communicated to the relevant officers, it would be important to maintain a degree of separation between the planning officers and the applicant, given the nature of the application.

RESOLVED - That the report be noted.

8. **TRANSPORT STRATEGY UPDATE: QUARTER 1 2021/22**

The Committee received a report of the Executive Director, Environment updating on progress with delivering the City of London Transport Strategy, covering Quarter 1 of 2021/22 (April – June 2021). A Member expressed his significant frustration at the delays to the reinstatement and improvement of the Thames Path for public access along the Riverside Walkway at Globe View. In response the Executive Director, Environment advised that officers appreciated the frustration and gave assurance that efforts were being made to progress the work.

RESOLVED – That the report be noted.

9. **STREETS AND WALKWAYS SUB-COMMITTEE - PUBLIC MINUTES**

RESOLVED – That the public minutes and non-public summary of the Streets and Walkways Sub-Committee meeting held on 10 September 2021 be noted.

10. **OUTSTANDING ACTIONS**

The Committee received a report of the Town Clerk detailing the Committee's list of outstanding actions. In respect of the outstanding action relating to Construction Management, the Chair commented that the 120 Fleet Street scheme would be a useful case study. A Member commented that in his

experience, after-hours work carried regulations including direct communication with neighbouring residents and queried whether this was still the case.

RESOLVED – That the outstanding actions list be noted.

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

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

RESOLVED – That Members note the report.

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

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

RESOLVED – That Members note the report.

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

A Member asked whether the Chief Planning Officer and Development Director could assure the Committee that officers would verify any statement they make about a planning application in their report or presentation. The Member added that this was in order to prevent a recurrence of the Committee's consideration of The Tulip application in April 2019, during which the Committee was informed that "the provision of an educational facility … is a significant benefit of the proposal enabling each London school child to visit once in their school lifetime". The Member advised that this statement was unverified, and on one calculation could only be true if each London school child remained in school beyond the age of 32. Subsequent to this, the origin of the statement was not explained. The Member asked what was done to assure that such statements were verified before their transmission to the Committee.

The Chief Planning Officer and Development Director assured the Committee that the verification of statements was undertaken at the application stage, and officers made every effort to address inaccurate or misleading statements throughout the application process.

A Member then commented that, given the considerable size of the main agenda packs, tabling further documents during a meeting was problematic, and further to this, if the Committee was to move towards paperless working, power points were needed due to length of meetings. Members further suggested that officers avoid submitting multiple applications to meetings, that the length of officer presentations be reviewed, and that the meeting equipment in the Livery Hall be improved, with a system like that in the Committee Rooms.

The Chair acknowledged the teething issues experienced, this being the first meeting following a return to fully physical attendance, and advised that feedback would be taken forward in preparation for the next meeting. The Chair added that he would consider brief adjournments for the Committee to consider tabled documents, noting that the Committee was obliged to consider as many representations as possible in deliberating an application. The Chief Planning Officer and Development Director confirmed that the addendum tabled at the meeting covered objections which had been received overnight prior to the meeting.

A Member then suggested that instructions for registering to speak at Committee, or a link to the speaking protocol be provided automatically to those submitting representations to the Planning department, as they had heard complaints relating to the accessibility of the process. The Chair noted the suggestion, confirming that the protocol for speaking at Committee was a public document.

A Member queried the statistic given in respect of listed buildings in the City of London, and asked for clarification as differing figures had been reported. The Chief Planning Officer and Development Director confirmed that 2.5% of buildings in the City of London were Grade I listed.

14. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There was no other business.

15. **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 Nos.	**Paragraph No(s).**
16	6
17	3
18 – 19	-

16. **CUSTOM HOUSE LOWER THAMES STREET LONDON EC3R 6EE - TPO**
The Committee considered a report of the Chief Planning Officer and Development Director concerning the Custom House Lower Thames Street London EC3R 6EE – TPO.

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**
The Committee received a report of the Department of the Chief Operating Officer regarding the 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.

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

19. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no other business in non-public session.

The meeting ended at 2.06 pm

Chair

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

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Committee:	**Date:**
Planning and Transportation	16 November 2021
Subject: 115 - 123 Houndsditch London EC3A 7BU Demolition of existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), flexible retail / cafe use (Class E); community space (Sui Generis), ancillary basement cycle parking, servicing and plant; new public realm and highway works; and other works associated with the development. (The proposed development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of flexible retail / cafe floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; Total floorspace 66,867 sq.m; Overall Height 116.995m AOD). (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.)	**Public**
Ward: Aldgate	**For Decision**
Registered No: 21/00622/FULEIA	**Registered on:** 19 July 2021
Conservation Area:	**Listed Building:** No

Summary

The site comprises the Land Bounded by Cutler Street and Houndsditch: 2 to 22 (even) and 28 Cutler Street, 115 to 120 and 123 to 125 Houndsditch, 1 to 8 and 24 to 26 Clothier Street and 1 to 12 Exchange Buildings as well as areas of Public Highway.

The Site comprises of four separate buildings built in the 1980s, including 115 Houndsditch (Cutlers Court), 120 Houndsditch and 123 Houndsditch (Cutlers Exchange) which are ground plus 5 storeys, and 117-119 Houndsditch which is ground plus 6 storeys.

Planning Permission is sought for the demolition of the existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), retail space (Class E); community space (Sui Generis), ancillary basement cycle parking, servicing and plant accommodation; and new public realm.

The development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of retail floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; totalling 66,867sq.m of floorspace.

Objections have been received from residents and third parties relating to the massing and bulk of the development, daylight and sunlight implications, the impact on the environment, impact on the amenity of the immediately surrounding area and buildings, and the loss of Clothier Street. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.

The proposal would deliver a high quality, triple aspect, office-led development with an outward facing socially inclusive cultural dimension and significant enhancements to the existing public realm which would meet the growing business needs of the City, supporting and strengthening opportunities for continued collaboration and clustering of businesses.

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 retail, community space and useable and increased public realm with flexible possibilities to support Petticoat Lane Market including storage and infrastructure for complementary popups.

These benefits would significantly enhance the vibrancy to the City's streets and create an active and engaging base to the building benefitting the City's diverse communities. These include:

- Community Space at ground and mezzanine level with a focus on urban greening and gardening supporting local needs, learning, sustainability with free access to local communities and school access
- Three retail units totalling including one affordable unit which would be available at 60% of market rates
- Incubator space would be provided over floors 1 and 2 including 23 desk spaces at 50% of market rate
- Opportunities for free storage space to support Petticoat Lane Market traders and the potential pop ups and kiosks along Cutler Street West

The development would deliver high quality distinctive, world class architecture and would enrich and add visual interest to local townscape and

Citywide skylines. The proposals will provide additional architectural and artistic collaborations supporting inclusiveness and working in partnership with local and diverse creatives, including heritage interpretation opportunities which would celebrate the history of the area.

The proposal would deliver a tall building on a suitable site. The proposal would not harm and would protect pan-London LVMF and local strategic views, and would preserve the OUV/significance, authenticity and integrity of the Tower of London World Heritage Site.

The proposal would preserve the special interest/significance and setting of designated heritage assets and non-designated heritage assets and would seek to enhance and celebrate heritage through artistic and cultural collaborations and interpretations.

The scheme benefits from high levels of public transport accessibility, would be car-free except for two blue-badge parking spaces in the basement and would promote cycling and walking as healthy modes of travel. It would comply with the London Plan requirements for long and short stay cycle parking, including a number of short stay cycle parking spaces within the new public realm.

Further enhancements include improving pedestrian movement and comfort to the streets wrapping around the building by setting back the new building line. The increase in floorspace and occupation of the development has the potential to place extra pressure on the comfort and safety of the City's streets. Overall, the pedestrian experience around the site is expected to significantly improve as a result of the proposals.

The existing Clothier Street is a service and refuse area which is poor quality in terms of public realm, safety and vibrancy and deemed to have no heritage value other than in name but does contribute to the permeability of the local area. To enable the deliverability of the scheme and its many benefits the existing route would be required to be stopped up. This impact is considered to be mitigated by the qualitative and quantitative benefits of the scheme in terms of public realm, pedestrian comfort, inclusiveness and safety. However, any stopping up would be subject to the separate statutory procedure.

The scheme delivers significant public realm enhancements, including an increase in quantity and quality of public realm. The perimeter spaces wrapping around the building would be outward facing, attractive and accessible spaces. There would be a net gain of approximately 173sq.m of new public realm and 27sq.m of public highway land.

The proposals would be particularly progressive and ambitious in terms of sustainability credentials for a tall building in the City of London.

- Operational carbon emissions reduced by 44% compared to a building regs compliant building, exceeding the minimum GLA requirement of 35%.

- Whole Life-Cycle carbon emissions reduced to comply with the GLA's aspirational benchmark
- Incorporation of thermal stores for waste heat to support development's space heating and share waste heat with the neighbouring Middlesex Street Estate
- Targeting an ambitious low operational energy use intensity in line with the London Energy Transformation Initiative's (LETI) target of 55 kWh/m2 (GIA) for the completed development. A raft of measures, e.g. relating to tenants agreements, power purchase agreements and reviewing the building services strategy are intended to be put in place to achieve this.
- On track to achieving highest ratings for BREEAM assessment "outstanding", WELL building standard "Platinum" and LEEDS standard "Platinum".
- Heat Rejection to Middlesex Estate to recirculate energy waste.

Urban greening is integral to the architecture and would be beneficial to all users of the building and would be experienced both from a distance and close proximity to the building. The existing UGF on the site is 0.00 and the proposed is calculated at 0.53 which significantly exceeds policy requirements.

There is one major adverse impact on nearby open space and a small number of minor adverse impacts to nearby residential properties, in terms of loss of daylight and sunlight, and overshadowing. However, taking into account the BRE Guidance, it is considered that the proposed development would not reduce the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, and would accord with relevant Local Plan and draft City Plan 2036 policies.

Negative impacts during construction, such as noise and pollution, 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 future adverse impacts.

The impacts of the proposed development on residential amenity have been considered and it has been concluded that the impact on residential amenity would not be significant, and the development would comply with Local Plan relevant policies.

The environmental impacts of the proposal, including wind microclimate, thermal comfort, flood risk, and air quality have been addressed in the application documents. It is considered that the proposed development would not have any significant adverse impact upon the environmental conditions of the surrounding area, and would comply with relevant Local Plan policies.

This development would be a progressive approach to sustainable, circular, accessible and behavioural design and addresses many of the key issues facing the City, London and the UK by providing a state of the art workplace that contributes to the local environment, City workers and local communities and supports the agenda for the City and London's Covid recovery.

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 Local Planning Authority 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.

Applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, it is considered that the proposed development complies with the development plan as a whole. Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied and planning obligations and other agreements being entered into under S106 of the Town and Country Planning Act 1990.

Recommendation

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

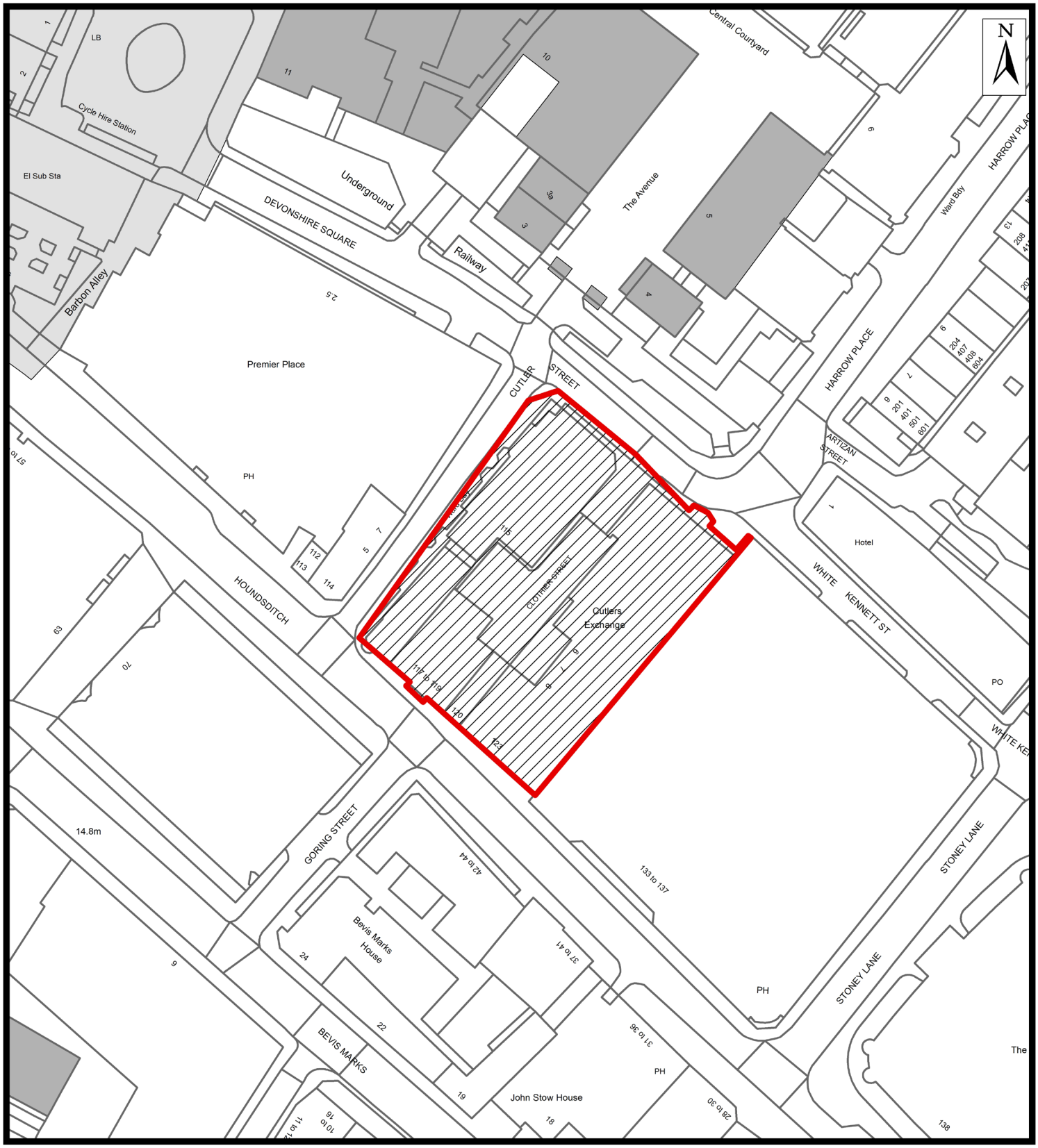
a) planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed;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

b) either receiving confirmation from the Secretary of State that the Corporation may grant planning permission as recommended or the expiry of the 30 day referral period.

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

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

Site Location Plan



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ADDRESS:
115-123 Houndsditch
EC3A 7BU

CASE No.
21/00622/FULEIA

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

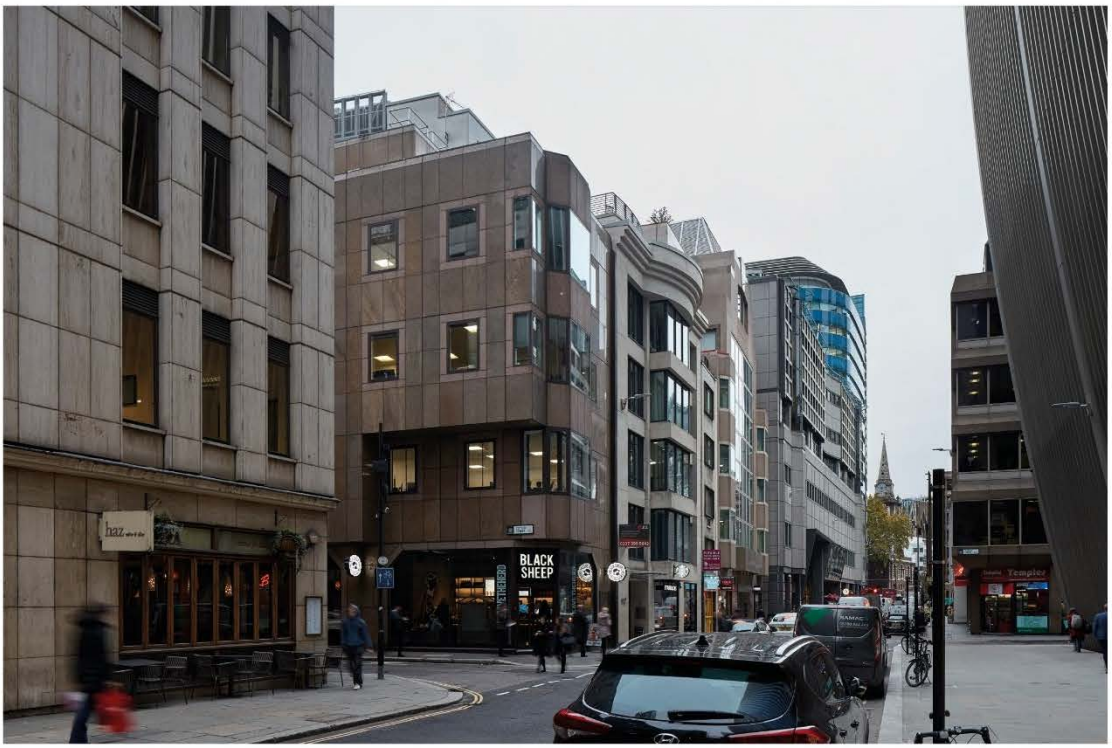
CITY OF LONDON BOUNDARY

CITY OF LONDON

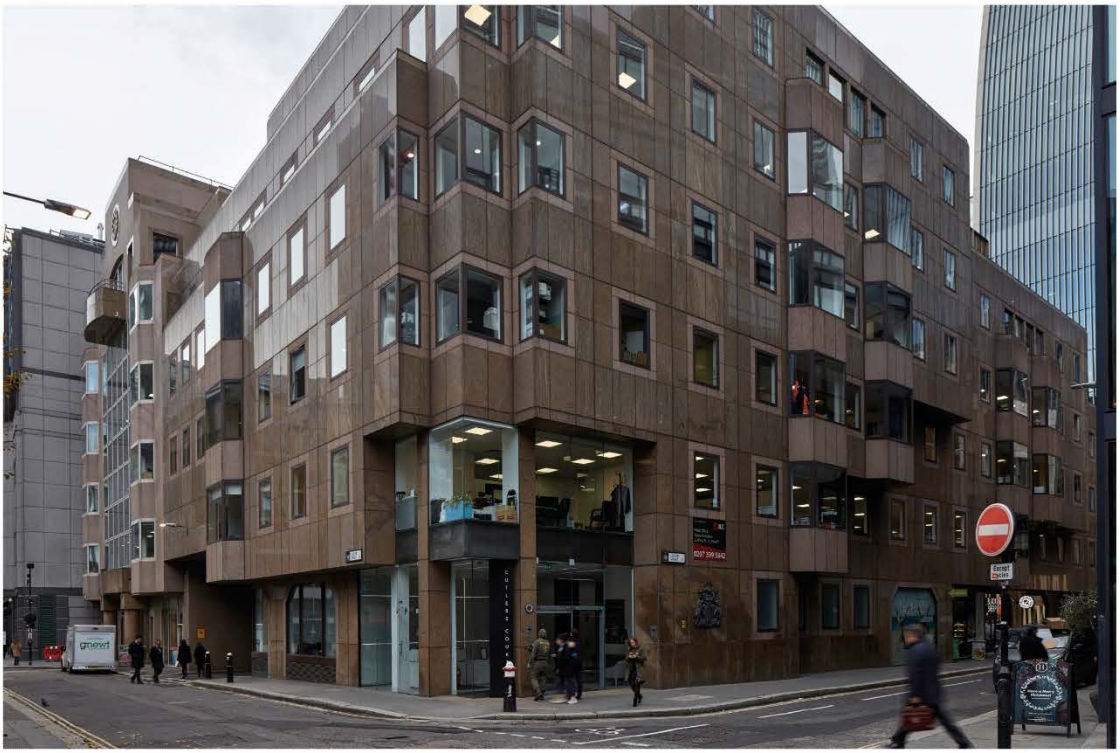
ENVIRONMENT DEPARTMENT



Approach from Harrow Place



Approach from Houndsditch



Approach from Devonshire

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 regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
    a) To examine the environmental information;
    b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination;
    c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
    d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. The local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to at paragraph 3(b) above is up to date.
5. The draft statement attached to this report at Appendix A sets out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions set out in the statement are up to date.
6. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also forms part of the environmental information before your Committee.
7. 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

8. The site extends to approximately 2,884 sqm (0.2884 ha) and comprises the Land Bounded by Cutler Street and Houndsditch: 2 to 22 (even) and

28 Cutler Street, 115 to 120 and 123 to 125 Houndsditch, 1 to 8 and 24 to 26 Clothier Street and 1 to 12 Exchange Buildings as well as areas of Public Highway.

9. The Site comprises of four separate buildings built in the 1980s, including 115 Houndsditch (Cutlers Court), 120 Houndsditch and 123 Houndsditch (Cutlers Exchange) which are ground plus 5 storeys, and 117-119 Houndsditch which is ground plus 6 storeys. The configuration of the Site comprises 14,326 sqm GIA (15,340 sqm GEA) of floorspace, this constituting 11,755 sqm GIA of office floorspace, 667 sqm GIA of retail floorspace, and 1,904 sqm GIA of back of house space.

10. None of the existing buildings within the Site boundary are listed. The Site is, however, situated in close proximity to a number of heritage assets, notably, and within about 0.1km of the Site, the 'London Wall: remains of Roman wall and bastion, Goring Street' scheduled monument, which sits to the north of the Site. Other listed buildings that sit in close proximity to the Site include the Grade II Listed Port of London Authority's Warehouses and Boundary Walls to the north west, and further afield, the Grade I Listed Bevis Marks Synagogue at Heneage Lane, which is just over 0.1km to the south of the Site, and the Grade II* Holland House beyond this. There are a number of other listed properties within the wider area and these are set out clearly as part of the Site context work included within the Design and Access Statement and as part of the TVBHA. The Site is not located within a Conservation Area. However, there are 3 Conservation Areas within a 250m radius of the Site, 'Bishopsgate' to the north-west, 'Wentworth Street' to the north and 'St Helen's Place' to the south-west. The wider context comprises St Paul's Cathedral (Grade I listed) and the Tower of London World Heritage Site (WHS).

11. The site lies within the defined 'Eastern Cluster' area (Policy CS7 of the adopted CoL Local Plan) which is identifiable as a cluster of the City's major financial and insurance firms, along with complementary uses, including retail, leisure and 'cultural heritage'.

12. The Site is located within Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)) and as such it has a low probability of flooding.

13. The Site is located within London's Central Activities Zone ('CAZ'), as defined in the London Plan which supports a range of strategic uses and functions including those relating to business, retailing and tourism.

14. The Site is located within an Airport Safeguarding Area.

Proposal

15. Planning Permission is sought for:

'Demolition of existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), flexible retail / cafe use (Class E); community space (Sui Generis),

ancillary basement cycle parking, servicing and plant; new public realm and highway works; and other works associated with the development.

(The proposed development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of flexible retail / cafe floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; Total floorspace 66,867sq.m; Overall Height 116.995m AOD).'

16. The proposed development would comprise a total of 66,867 sqm (GIA) incorporating the following land uses:

Use	Floor Level	Floor Area (GIA)
Office (Class E)	Level 01- Level 23	56,533sq.m
Retail and Café Use (Class E)	Ground	85sq.m
Community Use (Sui Generis)	Ground and Mezzanine	238sq.m
Ancillary (cycle parking)	Basement Levels	827sq.m
Ancillary (plant space, building management, fire command centre, security room, refuse and misc. storage and servicing areas)	Basement Levels	9,184sq.m

17. The proposed building is ground floor plus 23 upper storeys, and it will reach a maximum height of 116.995m AOD, equivalent to about 103m Above Ground Level ('AGL') which varies due to level changes across the Site.

18. The scheme is an office led development that would provide a minimum of 56,533sq.m (GIA) of new flexible office floorspace (Class E) across Level 01 to level 23. The office floorplates are designed to be occupied at a density of 1 person per 8m²; to accommodate a variety of possible office tenants across a range of corporate sector companies and to allow flexibility for tenancies to extend across floors and to use parts of individual floors through the creation of easily divisible and flexible space.

19. The Proposed Development will also deliver flexible space which is designed for incubator / SME users, located at Levels 1 and 2 of the proposed building. The 4,037sq.m GIA of space across these two floors will be made available as incubator space intended for SMEs, including affordable workspace comprising 23 desks available at 50% of market rent.

20. The office lobby is located at ground floor, with entrances from both Houndsditch and Cutler Street, allowing access from the south and north of the Site. Level access to the lobby space and prominent entrances for

cyclists that take users down to basement parking and associated amenities would be provided. The main method of vertical transportation from the reception to the office floors will be via lifts, although there is prominent stair access, encouraging active circulation.

21. The Proposed Development also incorporates various terraces and balconies, providing important office amenity, with landscaped planters on each level. At the top of the building there is a pavilion which connects to stepped roof terraces.

Public Realm

22. Clothier Street, an existing public highway in the middle of the site, which primarily supports back of house and servicing activity, is proposed to be stopped up as part of the Proposed Development. (This will be subject to the statutory stopping up procedures).

23. The Proposed Development will deliver approximately 580sq.m of public realm wrapping around the proposed building, including 372sq.m of land that is currently in the Applicant's ownership and that is proposed to be offered for dedication and adoption as new public highway to the CoL. The public realm would be extensively landscaped and greened; the development as a whole will secure a UGF score of 0.53, far exceeding policy requirements and a significant quantum of seating will be incorporated (46 spaces for 'sitting' or 'perching' proposed). The public realm design compliments the land uses proposed, specifically the retail spaces at ground floor and the community space located at the northern end of the building, as well as the delivery of carefully embedded security measures, including Hostile Vehicle Mitigation which has been designed into the public realm seating and planting strategy

24. Wider pavements around the site will be delivered, including a consistent minimum 2m wide pavement extending to between 3.9m and 7.4m in width. As well as creating an enlarged public realm within the Site boundary, the proposals include the delivery of a raised table along Cutler Street (West) and Cutler Street (North) enhancing the wider public realm environment and prioritising pedestrian and cycle movement. High quality natural York stone will be used for the paving in and around the Site. Within the public realm, it is proposed to have areas for the display of art installations and heritage interpretation as well as opportunities for market stalls as a potential extension to Petticoat Lane Market. The new public realm of Cutler Street will assist in improving connectivity between the City Cluster and the communities and areas to the north and east.

Retail Floorspace

25. The Proposed Development would provide 85sq.m GIA of flexible Class E retail / café space provided in three individual units at ground floor all similar in size. One of the retail units, comprising 28sq.m GIA, is proposed as affordable retail.

Community Space

26. A community space is proposed within the northern end of the building fronting onto Cutlers Street (North), comprising 238 sqm GIA at ground and mezzanine level.

27. The Community Space will sit alongside 'the garden street' and is proposed to comprise 'growing rooms' (social spaces and anchor for community garden and learning programmes, including workshop space for community and education groups and a retail component supplying local produce and light café/ food and beverage offer).

28. The community space will be available for use, free of charge, for registered education providers, community groups and charities between 7am and 10pm daily on weekdays, and between 10am and 6pm at weekends, with the food and beverage offer being available daily between these times as well.

Ancillary space: servicing, plant & cycle parking

29. The Proposed Development includes four levels of basement (plus a partial mezzanine at basement level 4) and has been arranged to accommodate plant machinery / equipment (with additional plant located at the top of the building), space for servicing, together with cycle parking and associated facilities.

30. The proposed basement level 1 (B1) will replace the existing single storey basements and will comprise extensive cycle parking and access arrangements, together with supporting facilities for showers, lockers and management. Proposed levels B2 and B3 are separate but effectively a 'shared volume' given that the proposed basement air handling units are double height and occupy space at both levels. These levels also include the extensive thermal storage tanks for cooling water (which extend from B4 up to the underside of the B1 slab). It is through the provisions of this infrastructure that the Applicant is able to offer and future proof the opportunity for the Middlesex Street Estate heat exchange scheme. The proposed B4 level contains the principal servicing facilities for the development, including the two vehicle lifts, two servicing bays, post room and refuse / recycling management facilities (bin stores), plus two accessible parking bays. The remainder of B4 and partial B4M (mezzanine) contain the remaining double height storage tanks for heating water, sprinkler and wet rising mains with associated pumps and grey water storage and processing.

31. Facilities for cyclists, comprising a total of 948 long stay and 33 short stay cycle parking spaces, will be provided. Alongside the cycle spaces, associated facilities for cyclists are also proposed, including showers, changing, locker and bicycle repair facilities. In addition to providing for cyclists, lockers and showers are provided for those walking or running to the Site. Access for cyclists from ground floor to the basement will be from dedicated and prominent cycle parking entrances at ground level from the north and south of the Site, which include dedicated cycle lifts from ground level. 21 short stay spaces are within the basement, with 12

spaces located in the new public realm within the site boundary (including 10 for the retail and community space uses).

32. All servicing for the development is proposed within the confines of the Site. The servicing bays are housed at the B4 level and are accessed via a pair of 15 Tonne vehicle lifts accessed from Houndsditch.

33. Dedicated areas of planting and greening would be incorporated into the development through a combination of green walls, green landscaping and new tree planting at ground level within the surrounding public realm.

Consultation

34. The Applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders. Prior to the application being submitted the applicant has undertaken extensive pre-application consultation with key stakeholders and local community (including nearby residents). The applicants have ongoing engagement with the Middlesex Estate Residents Association Chair from pre-application through the application process.

35. The applicant wrote to all neighbours, both residential and commercial, surrounding the site to invite them to take part in the consultation. Public engagement activities have taken place as a series of virtual presentations to key local stakeholders, two virtual exhibitions with digital feedback opportunities (with an alternative postal exhibition offered to consultees on the detailed design), two webinars with close neighbours, postal newsletters promoting the consultation, and targeted social media activities. This has given stakeholders, residents, and businesses the opportunity to meet with the Applicant and wider members of the project team and in the case of virtual presentations to key local stakeholders, be briefed on the application, and provide feedback on the detailed proposals. Meetings were held with key stakeholders on the following dates:

    - 23rd April 2021 Aldgate Connects BID
    - 16th May 2021 Middlesex Street Estate Residents Association (Middlesex Street Estate Site Visit)
    - 19th May 2021 Portsoken ward members
    - 21st May 2021 Middlesex Street Residents Association
    - 4th June 2021 Bevis Marks Synagogue
    - 17th June 2021 Middlesex Street Estate Residents Association

36. Following receipt of the application it has been advertised on site and in the press and following the receipt of additional information has been consulted upon twice, 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 all planning considerations within the representations received, and the consultation responses is set out in the tables below.

37. A total of 29 responses were received, 24 objections, four neutral representations and one letter of support.

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

39. The applicants have provided a detailed response to matters raised in consultee and third-party responses which are available to view on the public website and are listed in the background papers list at the end of this report.

Consultation Response	
Historic England	On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant. **Officer Response to Comments:** No further action required
NATS Safeguarding	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. **Officer Response to Comments:** No further action required
Transport for London	Healthy Streets and ATZ – The Transport Assessment is in a Healthy Streets format and includes an ATZ assessment in line with TFL guidance. Trip generation assessment – The applicant must confirm where line planning capacity information presented in the Healthy Streets Transport assessment has been obtained from. – Given there is an existing office space at this location, TfL requests the applicant uses existing occupant travel data to assess the split of LU trips by station, line and direction. Public Realm – TfL requests justification for the reintroduction of two-way traffic on Cutler Street North. Given the constraints on pedestrian space in this area, TfL would support retaining a one-way system (with cycle contraflow) and further narrowing of the carriageway. – Trees are proposed in the middle of the footway reducing usable pedestrian space. This imposes an unnecessary constraint on space for

	pedestrians. TfL would support trees moving out towards the kerb so that people can walk building-side in line with London Plan policies T2 (Healthy Streets) and D8 (Public realm). This will also increase access to light for the trees and allow the tree pits to take surface water run-off more effectively. Cycle Parking – TfL requires more information on access to the basement cycle parking is provided **Officer Response to Comments:** This has been resolved and is addressed in section Transport and Highways of this report.
London City Airport	Consulted, no comments received.
Natural England	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. **Officer Response to Comments:** No further action required
Crossrail Ltd	The implications of the Crossrail proposals for the application have been considered and I write to inform you that Crossrail Limited does not wish to make any comment on the application as submitted. **Officer Response to Comments:** No further action required
Thames Water	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. Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application. Conditions were also recommended regarding WATER. **Officer Response to Comments:** No further action required
Network Rail	Thank you for consulting Network Rail regarding the above application. After reviewing the associated information, I would like to inform you that Network Rail have no objections to the proposals. **Officer Response to Comments:** No further action required
Environment Agency	There are, no environmental constraints within our remit on this site and we therefore have no comments at this time. **Officer Response to Comments:** No further action required

London Borough of Southwark	Consulted, no comments received.
London Borough of Islington	Consulted, no comments received.
London Borough of Hackney	I can confirm that the London Borough of Hackney has no objections to the proposed development. **Officer Response to Comments:** No further action required
London Borough of Tower Hamlets	The Local Planning Authority has no comments to make. **Officer Response to Comments:** No further action required
H.M Tower of London	Consulted, no comments received
Historic Royal Palaces	Consulted, no comments received
Cleansing Services	The waste storage and collection facilities comply with the requirements of BS5906 specification. All occupants of the development will have access to the waste storage facilities. **Officer Response to Comments:** No further action required
Lead Local Flood Authority	Raised no objections to the proposals and have recommended conditions to be attached
Department for Levelling Up Housing and Communities	Consulted, no comments received.

Representations from members of the public (objections)	
Loss of light to podium (courtyard at Middlesex Street Estate)	**Officers Response to Comments:** Addressed in the section of the report entitled 'Daylight, sunlight and overshadowing'.
Loss of light to flats	**Officers Response to Comments:** Addressed in the section of the report entitled 'Daylight, sunlight and overshadowing'.
Loss of day and sunlight to commercial units located at Harrow Place	**Officers Response to Comments:** Addressed in the section of the report entitled 'Daylight, sunlight and overshadowing'.
Block view of the sky and reduce daylight	**Officers Response to Comments:** Addressed in the section of the report entitled 'Daylight, sunlight and overshadowing'.

Overshadowing	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Daylight, sunlight and overshadowing’.
Loss of Privacy	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Overlooking’.
Environmental Impact	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Environmental Impact of Proposals on Surrounding Area’
Principle of ‘Net Zero Carbon’ misleading	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Energy and C02 emissions’.
Sustainability Impact due to complete demolition of building	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Energy and Sustainability’.
Viability of Retail Space	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Economic Issues and Retail Floor Space’.
Viability of Office Space	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Economic Issues and Proposal’.
Noise from construction	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Noise and Vibration’.
Noise from increased traffic	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Noise and Vibration’.
Disruptions from construction	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Construction and Logistics’ and the section of the report entitled ‘Transport and Highways’.
Height of building higher than existing buildings	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Height, Massing and Design’.
Impact to existing business	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Considerations and Economic Issues’.
Size and scale of proposal in relation to existing buildings	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Height, Massing and Design’.
Loss of Air Quality	**Officers Response to Comments:** Addressed in the section of the report entitled ‘Air Quality’.
Loss of historic Clothier Street	**Officers Response to Comments:** Addressed in the section of the report entitled 'Demolition of the existing buildings and removal of Clothier Street’ and the section of the report entitled ‘Transport and Highways’.
Loss of Amenity/ Children’s	**Officers Response to Comments:**

Playground/ Podium Gardens	Addressed in the section of the report entitled 'Proposed Development with Existing Surrounding Buildings'.
General Pollution	**Officers Response to Comments:** Addressed in the section of the report entitled 'Light Pollution', the section of the report entitled 'Environmental Impact of Proposals on Surrounding Area', the section of the report entitled 'Noise and Vibration' and the section of the report entitled 'Transport and Highways'.
Traffic due to extra vehicle use generated with deliveries and visitors	**Officers Response to Comments:** Addressed in the section of the report entitled 'Transport and Highways'.
Overcrowding of the streets	**Officers Response to Comments:** Addressed in the section of the report entitled 'Transport and Highways'.
Out of character	**Officers Response to Comments:** Addressed in the section of the report entitled 'Height, Massing and Design'.
Insufficient greenery contribution	**Officers Response to Comments:** Addressed in the section of the report entitled 'Public Realm'.
Blocking light will prejudice the future installation of solar power generation on the Estate	**Officers Response to Comments:** Addressed in the section of the report entitled 'Daylight Sunlight and Overshadowing'.
Impact on Bevis Marks	**Officers Response to Comments:** Addressed in the section of the report entitled 'Heritage'.
There is no absolute commitment to build an effective heat transfer infrastructure, and then the amount of usable heat that will be transferred is questionable.	**Officers Response to Comments:** Addressed in the section of the report entitled 'Heat Transfer to Estate'.
Loss of Clothier Street as a public asset and right of way	**Officers Response to Comments:** Addressed in the section of the report entitled 'Transport and Highways', the section of the report entitled 'Public Realm' and the section of the report entitled 'Demolition of the existing buildings and removal of Clothier Street'.

Representations from members of the public (Neutral)	
Duration of construction	**Officers Response to Comments:**

	Addressed in the section of the report entitled 'Construction and Logistics' and within the section of the report entitled 'Transport and Highways'.
Information regarding the cumulative effect on the loss of light to flats	**Officers Response to Comments:** Addressed in the section of the report entitled 'Daylight, sunlight and overshadowing'.
Information on how business will be affected following approval.	**Officers Response to Comments:** Addressed in the section of the report entitled 'Considerations' and the section of the report entitled 'Transport and Highways'.

Representations from members of the public (support)	
The new community space will allow more green facilities/ initiatives	**Officers Response to Comments:** Addressed in the section of the report entitled 'Public Realm'.

Policy Context

40. 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.

41. The City of London has prepared a draft plan which is a material consideration to be taken into account. The draft City Plan 2036 was approved for consultation by the Court of Common Council in May 2020 and January 2021. The draft City Plan 2036 has been published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. As such, the draft City Plan is a material consideration in the determination of applications.

42. 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.

43. 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.

44. 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), Cultural Strategy 2018 – 2022 (CoL, and relevant Conservation Area Summaries.

Considerations

45. 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).

46. 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);

47. The National Planning Policy Framework (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".

48. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.

49. Paragraph 10 of the NPPF states that "at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:

a) approving development proposals that accord with an up-to-date development plan without delay; or

b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of date, granting permission unless:

c) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

d) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

50. 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)

51. Paragraph 81 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

52. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.

53. 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.

54. 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”.

55. 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.

56. 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”.

57. 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."

58. 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.

59. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.

60. 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.

61. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.

62. 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.

63. 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."

64. 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.

65. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. 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.

66. 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".

67. Paragraph 203 of the NPPF 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 in this case

68. In considering this planning application account has to be taken of the environmental information including the Environmental Statement, the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.

69. The principal 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
- Economic issues
- The appropriateness of the proposed uses
- The impact of the development in design and heritage terms including impact on designated and non-designated heritage assets.

- The impact of the proposal on Strategic Views and Protected Views.
- 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, and air quality.
- The requirement for financial contributions.

Economic Issues

70. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 520,000 people.

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

72. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that a majority of businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.

73. 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.

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

75. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

76. The London Plan projects future employment growth across London, projecting an increase in City employment. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.

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

78. 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.

79. 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.

80. The application site is located within the area identified as the Eastern Cluster in the Local Plan 2015.

81. The areas to which the cluster policy applies is defined by illustrative diagrams in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on suitable (Local Plan) or appropriate (emerging City Plan) sites. As outlined at para 2.7 of the Local Plan and paras 3.55 and 7.13 of the draft City Plan 2036 the boundary as shown in the diagrams is indicative and not prescriptive. The application site lies within the Eastern Cluster area as shown in Figure G in the adopted Local Plan

82. 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.

Principle of Uses

83. The proposed development would be arranged over four basement levels, ground and 23 upper floors to provide an office-led, mixed use development comprising predominantly office floorspace (Class E), with flexible retail/café units and community space, affordable workspace and improved public realm at the base of the building.

Proposed Office Accommodation

84. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 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. Policy S4 of the draft City Plan 2036 seeks to ensure that new office floorspace is designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the needs of SME's, start-up companies and those requiring move on accommodation.

85. The application site currently provides 11,755sq.m of office floorspace over four separate buildings. The proposed development would provide 56,533sq.m (GIA) of office (Class E) floorspace on the site. This equates to a total uplift in office floorspace across the site of 44,778sq.m (GIA).

86. The proposed floorplates would allow for flexibility through the creation of easily divisible and flexible space, allowing for a range of tenant sizes including small and medium sized businesses in accordance with Local

Plan policy DM1.3, and would provide additional high quality office floorspace, both in terms of design and sustainability credentials.

87. The proposed development would include 4,037sq.m of incubator / flexible workspace at levels 1 and 2 of the proposed building. This space would be made available as incubator space intended for SMEs including local start-up businesses. This area would be intended to be available to lease as anything from individual desks to small private spaces. These two levels of incubator space are connected by a separate staircase from ground, as well as via the lower level lifts. As part of this incubator space, 23 desks within this area are proposed to affordable, to be made available at 50% of market rate.

88. The office floorspace is considered to be well designed, flexible office accommodation in a well-considered and sustainable building, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and draft City Plan 2036 policy S4.

89. Each floor of the building would have access to a planted terrace, with level 19 having access to a larger terrace. A larger terrace would also be located at level 23 which would provide communal space for tenants. An additional private terrace would be located on the south section of level 23 for the 'Sky Pavilion' offices.

90. The main office reception is at ground floor level with entrances from both Houndsditch and Cutler Street, allowing access from the south and north of the site. From here lifts would provide access to the upper office floors, with prominent stair access also available.

91. The proposed office accommodation supports the aims of Local Plan policy CS1 and the Proposed Submission Draft City Plan 2036 policy S4 and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with Policy DM1.3 in the adopted Local Plan and Policy OF1 in the Proposed Submission Draft City Plan 2036.

Proposed Retail

92. The application site currently provides 667sq.m (GIA) of retail floorspace at ground floor level, predominantly located on Houndsditch and Cutler Street (west). The existing retail appears to comprise a couple of take-away food outlets and a couple of coffee shops, along with a dry cleaner to the rear.

93. The proposed development would incorporate three retail units at ground floor level, providing a total of 85sq.m (GIA) of flexible retail / café (Class E) floorspace. This would result in a loss of 582sq.m (GIA) of retail floorspace.

94. One of the retail units, comprising 28sq.m (GIA), is proposed as affordable retail to be let to 'start-up retailers' (or equivalent), with a

preference given to those being local to the Site, by way of an affordable retail lease at a rent (including service charges and all other overheads) that is not more than 60% of open market rent, to be secured by Section 106 Agreement.

95. The site is not located in a Principal Shopping Centre (PSC) or Retail Link as identified in the Local Plan. Local Plan 2015 Policy DM20.3 resists the loss of small groups of retail groups, particularly near residential areas. Most of the existing retail units are largely aimed at City workers, rather than the nearby residents, with the possible exception of the dry cleaners. The loss of the retail in this location would not adversely impact the residents, particularly given that an affordable retail unit is proposed on Cutler Street, near to the Middlesex Street Estate. The loss of retail floorspace is to some extent also offset by the proposed community use space (see the following section).

96. In addition to the proposed retail units, the new public realm around the building would be designed to accommodate pop up market stalls, food or coffee vans, or gazebos for events. This potential activation of the public realm could further add to vibrancy of the street and complement the proposed retail offer as well as improve the connections through to Petticoat Market.

97. The existing retail units don't appear to be very prominent in the streetscape and the proposed development includes active frontages on each elevation, along with improved public realm, seating, and the potential for occasional pop-up retail within the new public realm. On balance, despite the loss of floorspace/frontage it is considered that the scheme would comply with Policy DM20.3. A condition is recommended to ensure that spaces proposed for retail use remain in that use and are not changed to any other use within Class E.

Community Space

98. Policy S1 of the London Plan states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. Policy DM22.1 of the Local Plan states that 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 they would not be prejudicial to the business City, in locations convenient to the communities they serve, near to identified residential areas, and as part of major mixed-use developments.

99. It is proposed to provide a new community space in the north of the proposed building fronting onto Cutler Street (north), comprising 238sq.m (GIA) of floorspace at ground and mezzanine level. This has been developed following engagement with the local community and stakeholders. The space, alongside the external public realm, is designed around a 'greening' theme and would support a range of uses and activities meeting specific community needs. The space would comprise 'growing rooms' - social spaces for community garden and learning programmes, including workshop space for community and

education groups and a retail component supplying local produce and light café / food and beverage offer.

100. The Community Space would be available for use, free of charge, for registered education providers, community groups and charities between 7am and 10pm daily on weekdays, and between 10am and 6pm at weekends, with the food and beverage offer being available daily between these times as well. This space would be controlled through a Management Plan, to be secured by Section 106 Agreement.

101. An objection has been received from a nearby resident stating that there is already a community centre on the estate and as such this would not be a public benefit. Nevertheless, the community space proposed as part of this development is considered to be a different offering to that provided elsewhere in this area and is still considered to be a public benefit which would benefit the wider communities of this part of London.

Demolition of the existing buildings and removal of Clothier Street

102. The site has been redeveloped many times and through the late 17th century was part of a dense network of streets and yards between Houndsditch and Bishopsgate. The area was synonymous with trading and textiles with Petticoat Lane Clothing market dating from 1750s and East India Company warehouses to the north dating from 1768. By the late 19th century, the uses on the application site were varied and included warehouses, a clothing exchange, a Polish synagogue and a brewery. In the 20th century Cutler Street had a thriving market in clothing and nearby Houndsditch Warehouse was a successful department store from 1933 until demolition in 1986.

103. Historically there were two narrow NW-SE aligned streets, Clothier Street (formerly Carter Street) and Exchange Buildings which led from the western section of Cutler Street. Carter Street appears to date from the mid-18th century and Exchange Buildings from the post Great Fire period. The present NE-SW alignment of Clothier Street is at right angles to the previous street pattern and cuts across the former line of Clothier Street. The pedestrian route is close to the position of Exchange Buildings but does not respect its former width or length. The existing Clothier Street is therefore a relatively modern construct.

104. In the 1980s the area was redeveloped including the application site and comprises a series of post-modernist 5-6 storey office buildings. At this time the current L-shaped Clothier Street was established. Clothier Street is now a back of house service and refuse area and a somewhat hostile “back of house” route which bisects the northern part of the site and there is a pedestrian route through to the western section of Cutler Street. The existing postmodern buildings are polished stone with largely inactive ground floor elevations with narrow pavement widths surrounding the site and the area is one to move through rather than to linger.

105. The existing buildings, Clothier Street and the surrounding highway and pavement spaces in physical terms have no heritage value and present a poor-quality public realm experience. Collectively the demolition of the

existing buildings and loss of Clothier Street as a street plan are acceptable in townscape and heritage terms subject to compliance with other policies. The issues around demolition and whole life carbon are detailed in the sustainability section of the report and stopping up in the transport section.

106. Clothier Street (previously Carter Lane) is a street name established in approximately 1906. It reflects the second-hand clothing trade and clothes exchanges on the site and in the close vicinity and in name this has heritage evidential value. The site is also known for an attempted burglary at a jeweller's shop in Houndsditch in December 2010. Three City of London Police Officers were shot dead trying to prevent the burglary; this incident and events surrounding it were a precursor to the Siege of Sidney Street in January 2011. As part of the Cultural Plan as outlined this rich heritage of the site and historic associations would be recognised through interpretation panels and/or artwork. This would be secured and delivered through the final Cultural Plan and Strategy within the S106 agreement and include a commitment to engage with residents and other local stakeholders.

Height, massing and design

Principle of a Tall building

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

108. The proposed building would be in the north-east corner of the (Eastern) Cluster Policy Area CS7 in the adopted Local Plan (2015). This policy identifies the Cluster as the preferred location for siting tall buildings, where suitable or appropriate. Although the site falls just outside the draft replacement Local Plan's City Cluster policy area, the boundary is not prescriptive and the principle of a tall building on the immediate periphery still needs to be assessed on its planning merits. The principle of a taller building here is acceptable in broad policy terms though its height and design, including the impact on strategic and protected views, heritage, public realm and amenity need to be considered in accordance with policy CS14 of the Local Plan and policy S12 Tall Buildings of the draft City Plan.

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

110. Strategically a tall building on this site supports good growth, London Plan and City Plan policies. The tall building therefore is to be assessed against the criteria set out in City Plan CS 14(3) and Draft City Plan S12(2-6), London Plan D9 and the wider provisions of the Development Plan.

Skyline Impact and Relationship with the City Cluster

111. Although within the adopted Local Plan's Eastern Cluster policy area the proposal is outside of the emerging CS21 City Cluster Key Area of Change. The proposed development would be a transition "lower" tall building in the north east fringe of the City as part of the foothills which step down northwards from the main City Cluster. As a comparison, the following list outlines the heights of existing, emerging and permitted towers in the City Cluster (in descending AOD height order, with the proposal in bold) as well as buildings within the surrounding local area to the site which form the lower foothills:

- 1 Undershaft: 305.9m
- 22 Bishopsgate: 294.94m
- 100 Leadenhall Street: 263.40m
- 122 Leadenhall Street: 239.40m
- 110 Bishopsgate (former Heron Tower): 217.80m
- 52-54 Lime Street: 206.50m
- Tower 42: 199.60m
- 31 Bury Street: 197.94m - REFUSED
- The Gherkin (30 St Mary Axe): 195m
- 6-8 Bishopsgate: 185.10m
- 1 Leadenhall Street: 182.70m
- 100 Bishopsgate: 184m
- 40 Leadenhall Street: 170m
- 115-123 Houndsditch 116.995m (the current proposal)
- 24 Bevis Marks: 99.700m
- 70 St Mary Axe: 90m
- 6 Bevis Marks - 87.8m
- Petticoat Tower (approx) 85. 5m
- St Botolph Building 138 Houndsditch: 78.0m

112. The Planning and Transportation Committee were informed on 26 April 2016 that the Department of the Built Environment is undertaking three-dimensional (3D) digital modelling of the City Cluster to better understand the effect of existing planning policies for that area and its relationship to its environs and other parts of the City and in particular the Tower of London. This work is providing confidence that the Cluster can evolve while taking full account of views. The purpose of the modelling is to allow an appreciation of impacts arising from proposed development. The 3D modelling does not set policy or determine the future shape of the cluster.

113. Through this 3D modelling initiative, the City is aspiring to develop a Cluster of towers that step up in height from all directions towards an apex around 22 Bishopsgate/1 Undershaft. This was informed by the complex amalgamation of key views of the Tower of London, St Paul's Cathedral and other landmarks. In views from the south and south-east, north and northeast the proposed building's height would be broadly compliant with this modelled future shape as part of the lower foothills

outside of the City Cluster. The foothills facilitate a comfortable transitioning from very tall to the finer urban grain usually lower scale of the more sensitive and historic parts of the city.

114. The proposed height (24 storeys), form and high architectural quality would make a limited contribution to London's skyline as in many macro views the development would be screened by existing or emerging taller buildings. That said, due to its height, the proposed building would have a visual impact and change local townscape views and experiences.

115. The height and sculpted massing have been designed to respond to distant kinetic experiences to preserve the setting and silhouette of the Tower of London World Heritage Site and to comply with views within the SPG Management guidance for LVMF 10A.1 North Bastion of Tower Bridge and LVMF 25A.1, 25A.2, 25A.3 Queens Walk. In these viewing experiences the development would have no adverse impact and either sit below the ridge line of the Tower of London to protect the silhouette, blend into the existing background layers of the skyline or be some distance from the strategic landmark.

116. In more local contexts, the site sits within a transition zone and straddles two areas of distinctive scales and architectural characters. That of the high rise glassy commercial City Cluster to the south and southwest and the more solid smaller scale and partially warehouse/ Georgian and 20th century residential character of the city fringe townscape to the north and northeast including Devonshire Square, Middlesex Street Estate and Bishopsgate Conservation Area and borders LB Tower Hamlets.

117. The proposed height and massing would cascade from the south to north from 24 storeys (116. 995m AOD) to 18 storeys (90.190m AOD to 19th storey terrace) to mediate between the city cluster and lower scale and finer urban grain of the warehouse/residential context. The overall height and massing would be distinctly part of the foothills outside of the main City Cluster surrounded by emerging buildings of a similar height including: 6 Bevis Marks (87.m AOD), 24 Bevis Marks (99.700m AOD), 138 Houndsditch (78m AOD), 70 St Mary Axe (90m AOD) and the 1970s residential block Petticoat Tower (68.2m AOD).

118. The building line would be cut back at ground level to widen existing pavements and create a generosity at street level with active frontages and tree planting. The building line above the stepped back raked base would oversail the 4 storey base to a greater degree in some areas and a lesser degree in other areas around the perimeter compared to the existing building. The most significant increase would be to Cutler Street (West) and the northwest corner. Despite the quantifiable increase the raised height of the base and distribution of massing would increase daylight and views of the sky around the perimeter of the building particularly Cutler Street (West) This is further analysed in the Public Realm section.

119. As a 360 degree experience the tiered massing and different architectural treatments to the elevations would respond positively to the varied contexts. Where there are the kinetic glimpses of the building in

local long views within the city the height and massing would either be subordinate to taller buildings in the foreground such as from the west from London Wall or the development would be screened by other buildings or blend into existing and emerging townscape views from the south Leadenhall Street, Bury Street, Aldgate High Street and Minories. From Wentworth Conservation Area in the north (LB Tower Hamlets) the development would be experienced with the northeast elevation stepping down against a background of taller buildings in the City Cluster or with Petticoat Tower in the foreground.

120. In closer adjacencies the development would be visually impactful on the podium to Middlesex Street Estate knows as Petticoat Square. There would be an indirect change in the experience of this space bringing the current taller northern edge fringe of the taller foothills closer to this private communal space. As a kinetic experience within the podium the appearance and impact would vary, and the development would either be experienced in the context of Petticoat Tower or as part of a background of existing taller buildings of the City Cluster.

121. It is acknowledged that there would be an increased sense of visual enclosure to the podium and so the architectural treatment of tiered massing stepping, significant urban greening and richly articulated façade of smaller components would ensure the addition to the foothills would be visually rich and distinctive. These architectural devices would also break up the perceived massing into components to mitigate any visual dominance. Other taller buildings are already visible from the podium and dwellings and as a further addition to the wider local townscape this would not be a visually incongruous insertion. The impact on microclimate and the amenity of residents and Petticoat Square as an outdoor space is addressed in the relevant sections of the report.

122. In the visual experiences from Devonshire Square, Culters Estate and Houndsditch the development would be seen against open sky and contrast with the foreground buildings of a finer urban scale but with a periphery of taller buildings within the wider setting.

123. In these more local townscape adjacencies, the form of the building would cascade from north to south surmounted by an innovative green crown and the lower shoulder to the north would serve to transition the scale to the finer urban grain in this fringe of the City. The additional devices of chamfered corners, and richness of the elevation in terms of detail including both bold vertical articulation and complex terraces and bays there would be a perceived slenderness from street level which would break down the overall structure into a series of smaller parts and proportions. The proposed development would effectively and successfully consolidate this lower northern edge and create a clear and architecturally distinctive bookend to the outer perimeter of the City Cluster and play a positive role in the transition to lower rise buildings in the north. As an architectural addition within the townscape the urban greening and striking architectural details would provide a new and intriguing visual delight appropriate to the diverse townscape context.

124. City Plan Policy S12 and London Plan Policy D9 require tall buildings to provide publicly accessible space at an elevated level. In this case due to the lower height of the building, proximity of residents and hemmed in nature of the site to the north the visual experience would be of limited value. The proposed public offer is therefore the ground floor community space and the increase in enhanced public realm which are addressed further in the report under the relevant sections.

Architectural approach

125. A holistic and inclusive approach underpins the proposals. Design drivers are context, sustainability, and urban greening principles to deliver a more outward facing style of architecture which externally expresses the internal functions and structure of the building. Architectural decisions have been fundamentally governed by an approach to constantly reduced carbon emissions as the scheme has been refined through the planning process.

126. This part of the City is not defined by any single architectural style or era, it is multi-layered, and the scheme responds to its transition location between city fringe and city cluster and therefore can support a building which is architecturally distinctive. The envelope has a defined hierarchy with tiered crown and raked base which creates a bold silhouette. The facades are highly articulated with multiple layers of detail with striking vertical and horizontal expressions.

127. The building has a sense of architectural drama achieved through form, articulation, and colour with soaring pale terracotta vertical folded piers, dropping dark art deco inspired metal bays and the anchoring to the ground by red muscular six storey internal Y props. These features define the building as a visual marker in longer views. But also provide a sense of intimacy in experiences closer to the building achieved through human scaled components such as the warehouse/apartment style metal bays active uses, and attention to crafted details, which are complex and refined. The reimagination of the existing public realm and extensive urban greening would be publicly visible are also integral to the architectural narrative to soften appearance, support wellness, biodiversity and make the building social and inviting.

128. The envelope and facades have varied treatments to respond to the differing contexts of city cluster and city fringe. The facade to the southeast is more formal and ordered and in comparison, the northeast and northwest are broken down with cascading terraces and corner balconies. The party wall to 133 Houndsditch restricts the architectural approach to ensure the elevation does not prejudice future development opportunities. The elevation would be visible in oblique views particularly from Houndsditch, Petticoat Square, Aldgate Square, White Kennet Street, and a simpler treatment is proposed but which still delivers design quality and references the rhythm of vertical terracotta piers and horizontal bands with inset windows to the staircases.

129. Urban greening is provided on corner balconies and cascading facade planters integrated to the northwest and northeast facades. This would

add visual delight internally and externally breaking up and softening the elevations. Additional moments of planting are provided via green walls to the upper pavilion, to screen the plant, to the larger roof terraces as part of the recessive tiers and at ground level in the form of a further green wall adjacent to the community use and public realm planting. The planting is integral to the architecture and intended to provide seasonal interest throughout the year. The mix would be 50/50 decisions and evergreen to ensure year-round interest and variation in terms of look and feel. At application stage details of maintenance and access have been provided to ensure deliverability and this would be further controlled long term via a condition.

130. The sky pavilion at the uppermost floors is designed as two interlocking forms surrounded by green roof terraces which are surmounted by a minimal plant which is innovatively shrouded in green planting. As a grouping these create a unique silhouette as a crown which reinforces a sense of diminishing proportions and traditional hierarchy in longer views.

131. The four storeys of transparent raked envelope at ground level would deliver active frontages and provide visual connections to internal functions including incubator spaces at Level 1 and 2 and at ground the reception, retail pods and community space. The innerworkings of the building would be expressed externally. The raked primary structure of Y props enables the delivery of a column free public and would be a dramatic internal feature and this is celebrated soaring through the base of the building to six levels connecting externally to the colourful cleats and piers and other structural elements. This provides a visual logic to construction and the physicality of the building which would be perceived externally.

132. The active base would be defined by chamfered corner entrances into the office spaces and two dedicated cycle entrances in legible prominent locations. This space is a communal social interchange for arrivals on foot and on bicycle. The retail pods and the community use would provide another dimension of activity and be designed as animated bay insertions which would pick up on the architecture of the overall building through colour and attention to detail and would have an individual expression.

133. The loading bay has been thoughtfully designed and integrated into the building on Houndsditch. This would have an articulated building line refencing the bays elsewhere on the building and decorative perforated screen providing glimpses into a functional but colourful dynamic service area. Externally the area would be surrounded by greening and as a function the service bay would be celebrated rather than played down.

134. The proposals would integrate art projects across different areas of the building as both permanent and temporary interventions. These would be the subject of an art brief which would be embedded within the S106 and would require partnership working with local creatives and those from diverse backgrounds. Areas proposed include: the dropping bay

soffit treatment; screens and louvers; the green wall adjacent to the community use; community unit and the lorry lift interior.

135. A wider comprehensive lighting scheme is proposed for the public realm, interior of the lobby and podium area, balconies, and terraces. The design intentions are to minimise spillage, to be appropriate for various times of day; and to reduce energy consumption. The office lighting has been designed to be set back 1.5m from the façade. This would ensure the sophisticated architecture and spatial qualities of the development are appreciated after nightfall and impact to residents and biodiversity is minimised.

Conclusion

136. The site is considered appropriate for a tall building of this height and complies with City Plan Policy CS14 and emerging policy S12 and London Plan Policy D9. The cascading massing, dramatic yet refined design approach, materials, colour and intended quality would add a level of richness and visual interest to the local townscape and would support the emerging vibrancy of the wider area. The location is considered appropriate in terms of the city skyline, the character and amenity of the surroundings and in relation to existing tall buildings within the foothills and would provide opportunities for enhanced public realm. Final materials, details and collaborative art pieces would be the subject of conditions. The proposals comply Local Plan Policies CS10 and DM10.1. emerging City Plan Policy S8 and DE2 and London Plan D3. The proposals comply with those policies and with paragraph 130 and 132 of the NPPF.

Heritage Impacts

137. The proposals have been subject to detailed assessment of strategic and local views. The mass and form of the proposed development has been shaped by the visual constraints of designated views and sculpted and refined in response to townscape character and the setting of designated heritage assets

138. In total 57 viewpoint locations have been undertaken to assess impacts. There would be no harm to the Tower of London WHS, nearby listed buildings, conservation areas or non-designated heritage assets. Views of St Pauls Cathedral are not affected as the development would be concealed by existing taller foreground buildings and there would be no impact on the Fleet Street processional route.

139. Early pre-application discussions were undertaken with Historic Royal Palaces and Historic England and no objections have been received following formal consultation as part of this application.

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

140. The seven overarching attributes of Outstanding Universal Value are contained in the Statement of Outstanding Universal Value, itself contained in the World Heritage Site (WHS) Management Plan, have underpinned this assessment, alongside the components contributing to

each attribute. It is considered that three attributes are of particular relevance to assessing the impact of the proposal: (i) an internationally famous monument, (ii) landmark siting and (iii) physical dominance of the White Tower.

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

142. The Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the commercial centre, stating (at para 2.4.25) 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. It is also acknowledged that the relationship between the ToL and the Cluster is long-established, having existed for over half a century. It acknowledges that the Cluster forms a backdrop in views, including over buildings in the Inner Ward. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. The Management Plan, at para 7.3.27, states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS will continue to need to consider (i) their effect on the established Cluster (ii) the space between it and the ToL and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

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

144. There are two views within the London View Management Framework which are critical in assessing the impact of the proposed building on the World Heritage Site, Tower Bridge (10A) and City Hall (25A) and these are considered in detail the Strategic View Section.

Strategic Views

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

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

146. The LVMF SPG states that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space around the White Tower, and that where it has been

compromised its visual dominance has been devalued. It also states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as the spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background include the Cannon Street Station towers, BT Tower, Centre Point and the Tate Modern (para 182).

147. The visual management guidance anticipates the consolidation of the Cluster which it is deemed will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (para 187). The guidance also states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground; that guidance applies, in particular, to the Monument (para 185). The visual management guidance also states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186).

148. The proposal would not breach the skyline of the four towers of the White Tower or its castellations, in accordance with the relevant part of paragraph 186 of the visual management guidance, and the White Tower would continue to pre-emanate over the foreground, the whole ToL ensemble with a commanding presence on the River. In addition, wider landmarks, would not be obscured, and a relationship between these landmarks would remain undiluted, in accordance with paragraph 185 of the SPG. It is considered that under both baseline and cumulative scenarios the proposed building would not diminish, the appreciation of the dominance and pre-eminence of the ToL as a Strategically Important Landmark, or other identified landmarks and would preserve the appreciation of the OUV, in particular the attributes an internationally famous monument, landmark siting and the physical dominance of the White Tower, its integrity and authenticity. In this regard, the proposed building would not conflict with London Plan Policies D9 (e) and HC2, Local Plan Policy CS 13, draft City Plan Policy 2036 and guidance contained in the LVMF SPG and the LSS.

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

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

150. The Protected Vista and Silhouette would remain unaffected.

151. The proposed building would appear to the right of the City Cluster at a lower level integrated into the scale of the backdrop of the section between the City and the ToL WHS. At no point in the three Assessment viewpoints would the proposal appear near the White Tower. The proposal would not undermine the composition and characteristics of the view or those landmark elements including the Port of London Authority. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark

152. The proposal would preserve the relevant attributes of OUV and those associated components. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct juxtaposing urban forms, in accordance with the visual management guidance (paragraphs 418-422) and guidance contained in the Local Setting Study.

Other World Heritage Site views

153. The Local Setting Study (Section 7) identifies Representative Views which are deemed to exemplify the OUV of the ToL. It provides an analysis of the character of these views as a baseline against which change can be assessed. In particular, the following were assessed View 1 (Inner Ward Scaffold Site) View 2 (Inner Curtain Wall, North) 4 (Inner Curtain Wall, South) and 5 (Byward Tower Entrance). These representative views have been tested and the proposed development would not be visible.

Dynamic Journey across Tower Bridge

154. The experience is identified in the Local Setting Study as Route 14 of the Approaches and Arrivals (Section 5), which acknowledges the overlap between these local views and the River Prospect at LVMF 10A.1. The identified aim is ‘to create views in which the Tower of London is perceived as a riverside gateway lying at the edge of the City rather than ‘lost in the City’; in which the scale of the White Tower is perceived as more prominent as than the building surrounding it; and in which the military architecture of the Tower and its defences can be appreciated’.

155. Viewpoints corresponding to this experience have been assessed in the submitted TBHVIA and addendums and in the three-dimensional digital model. From the sequence of viewpoints crossing Tower Bridge and onto the northern bridge approach the proposed building would largely be concealed, form part of the background urban layering or read as part of the low foothills to the main City Cluster. The uppermost parts of the building would appear fleetingly between the north and south bastions but as part of an existing backdrop of distant low developments and any impact would be distant, recessive, and negligible. In both baseline and cumulative scenarios, the White Tower is considered to retain its

prominence and the presence of the military architecture and defences of the WHS remain undimmed by the proposed building.

Other Views

156. In other views and approaches to the Tower identified in the Local Setting Study, the proposal would be peripheral, low level and indistinctive on the skyline and often screened by taller buildings and located some distance from the World Heritage Site.

Conclusion – Impact on Tower of London World Heritage Site:

157. The proposed building would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF. In all other views, including the relevant approach and representative views, it is considered in line with the WHS SPG that the scale of change in all instances it is deemed to be negligible to no impact. Overall, it is considered that the proposed building would not harm the attributes of the OUV or any of the components, authenticity or integrity of the WHS, preserving its significance. In line with Section 6 of the SPG the height, form and detailed design of the proposal has been amended to mitigate any potential impact, ensuring the proposal would read as part of the emerging low foothills stepping down from the main City cluster

158. The proposed building would therefore comply with London Plan Policies D9 (e), HC2 and HC3, HC4 which seeks to ensure the implementation of the LVMF. Local Plan Policies CS12 and CS13 of the City of London Local Plan and draft City Plan 2036 policies S11, S13 and HE3.

Wider London View Management Framework Impact:

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

160. The proposed development would not impact on any other LVMF views.

Conclusion – Summary of LVMF Impacts

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

Impact on significance and setting of listed buildings

162. There are several listed buildings near the site of the proposed building. Additionally, the scale and height of the proposed building would affect the settings of a few other listed buildings further afield. These are discussed in turn:

Bevis Marks Synagogue: grade I

Significance and contribution to setting

163. Synagogue of 1699-1701. This is the oldest synagogue in the country and survives to a remarkably little altered degree. It comprises an undemonstrative rectangular plan, of simple red brick with modest Portland stone classical dressings and tall pitched roof (originally clad in clay tile, now slate) behind a plain (rebuilt) parapet above cornice level. The principal elevation is off-street, the western elevation containing the main entrance and is symmetrically composed around a central axis door with good early Georgian door and architrave topped by an elliptical window. Otherwise, the building has two registers of windows, with the upper tier being large, round-arched windows to optimise daylight to the interior in what has always been a dense, built-up mid-block location. The building was constructed by Joseph Avis, a carpenter with links to the office of Sir Christopher Wren. Architecturally the building reflects the simple vernacular of contemporaneous City churches and nonconformist chapels. Inside, the plan form, fixtures and fittings are still of 1701. It is a single double-height volume, galleried on three sides, with a flat plaster ceiling from which hang seven original chandeliers, while much of the original woodwork interior and fittings are uniquely intact.

164. The building is located in an undemonstrative off-street location in an enclosed private courtyard, a situation representative of the long and complex history of Anglo-Jewry from formal expulsion in 1290 to a semi-formal acceptance during the Commonwealth resulting in re-settlement. This results in a very high level of historic significance to subsequent layers of Jewish communities in Britain down to the present day. It is the oldest surviving synagogue in England in continuous use since its construction, including through the Second World War, and is thus considered the synagogue in longest continuous use in Europe.

165. The synagogue retains its setting in a courtyard discreetly located off the main thoroughfare of Bevis Marks. It has no street presence but for its south-east elevation to Heneage Lane, a plain brick elevation pierced with three prominent round-arched windows. This forms the centrepiece of a characterful ensemble of brickwork elevations including the Rabbi's House fronting the north side of Heneage Lane. Otherwise, the principal approach to the synagogue is through a gateway in a modern building fronting Bevis Marks which provides access to the courtyard, a chevron of paved area flanking the synagogue's north-east and north-west elevations. From here the synagogue is seen hemmed in by other buildings of a similar scale and mostly of the same brickwork materiality, including the Rabbi's House which directly adjoins it to the east. The sense of an architecturally reserved and deliberately secluded setting continues to be legible and consequently the ensemble of the synagogue, its neighbouring buildings and the courtyard has high architectural and historic significance. Because of its informal, secluded setting, there are no formal viewpoints of the synagogue but rather a series of informal vistas and closeups.

166. In terms of the contribution of setting to significance, the wider modern setting includes a number of tall and very tall buildings, both existing and consented, some of which are clearly visible as prominent elements from the courtyard such as One Creechurch Place, No. 6 Bevis Marks and the Gherkin. All have visual impacts on upward views from within the courtyard and visually reinforce the appreciation the synagogue's secluded location in the heart of the modern City. Additional consented tall buildings, such as 100 Leadenhall Street, 40 Leadenhall and 1 Undershaft, 24 Bevis Marks House will add to this backdrop. Otherwise, there is an open sky setting over the synagogue, courtyard, and ancillary buildings.

167. While the contrast between the scale and character of the synagogue and its taller modern setting is very noticeable when deliberately looking upwards, the established character of this part of the City is one of dramatic juxtapositions of old and new and of taller buildings as a backdrop to historic buildings. This is a defining characteristic of the Cluster and foothills and the positive frisson between the historic and modern City is unique in townscape terms. In all courtyard views the synagogue holds the eye, is overwhelmingly prominent and is the defining focal point.

168. The close, immediate setting of the synagogue is preserved in the intimate courtyard in part resembles the setting at the time the synagogue was constructed and therefore makes a strong and defining contribution to its significance but the wider setting beyond has changed significantly and now has a fundamentally different modern character that makes no material contribution to the significance of the listed building.

169. The principal elements of setting which contribute to and accentuate an appreciation of significance are the immediate courtyard visual setting, accessed off Bevis Marks, and the setting on Heneage Lane and relationship with the Rabbi's House.

Impact Assessment:

170. The impact of the proposal would be indirect, via change in its much wider setting, rather than direct and physical. The development is some 85 m from the designated heritage asset located to the northwest. The core significance, architectural, evidential, historical, and communal, which is drawn from the authentic and tangible physical fabric which has played host to the spirit of the place, in particular the interior, would be undiluted and are very self-contained. No fabric would be lost, obscured or de-contextualised, but the ever-changing and dynamic wider townscape setting which provides the backdrop canvass to this, and which accentuates and makes even more remarkable the survival of this heritage, would change, but would not prevent those rich traditions from continuing.

171. In baseline experiences the upper levels of the proposed development would be partially experienced at a tangent including a glimpse of the green roof plant southwestern corner balconies and the west facing party

wall would be visible from within the courtyard in upward views northwards. The solidity and palette of colours would complement the courtyard setting. No views of the synagogue would be obscured as the buildings would behind the viewer and neither the fabric of synagogue nor the intimate courtyard would be altered. The visibility of the proposed development would change the composition of this outward northern facing view from the courtyard but the character of the wider setting to the synagogue of taller modern buildings would remain consistent.

172. The proposed building would add another modern form into the 360-degree backdrop experienced from within the courtyard. It would occupy a small portion of currently open sky space above the 1980s buildings which oversail the entrance gate to the courtyard. Due to the northerly location and distance from the designated heritage asset the proposed building would not interface directly with the synagogue building and therefore the proposed building would not mar the viewer's ability to appreciate the powerfully simple architectures of the synagogue or the courtyard buildings. From within the courtyard the synagogue would remain the prominent building and focal point.

173. Historically, part of the significance of the synagogue's setting is that it has always been a sanctuary of worship secluded and feeling a world away within a densely developed urban area. It is not considered that the proposed building would materially alter this perception. The proposed building would be a sophisticated piece of intricated architecture highly articulated with integral urban greening providing a high-quality backdrop distinct form the pre-eminent historic architecture of the synagogue and its courtyard and the 1980s buildings enclosing the north of the courtyard.

174. Consequently, in views from within the courtyard, the proposed building is not considered to cause harm to the significance or setting of the synagogue or the courtyard complex. The synagogue would remain the dominant presence in the glimpse views from the courtyard and the courtyard setting would retain its secluded intimate character and its contribution to setting and the significance of the synagogue would be preserved.

175. As the proposed development is to the north of the synagogue 85m away any diminution of internal lighting levels would be expected to be imperceptible with no material impact on worship or the appreciation of the historic significance of the intact interior and original fittings of the synagogue interior

176. Taking into consideration the cumulative effects the consented 19 storey Bevis Marks House much closer to the synagogue approximately 25m to the northeast would conceal the proposed development in its entirety in views from the synagogue's courtyard.

Conclusion

177. It is considered that in visual, physical, and environmental terms, under both baseline and cumulative scenarios, the proposed building would

preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.

The Aldgate School (listed as Sir John Cass School): grade II*

178. School of 1908, of red brick with classical stone detailing in the 'neo-Wren' manner. The associated playground and railings all positively contribute to the building's setting and its significance. To the east, the church's setting is further enhanced by the open space of Aldgate Square and the group relationship with St Botolph without Aldgate church; to the west, the school is framed by the finer urban grain and historic townscape of Mitre Street. The wider setting is otherwise characterised by modern commercial buildings of medium scale in the City, with the tall buildings of the City Cluster located to the west which do not have a relationship with heritage values of school and do not contribute to significance.

179. The upper parts of the proposed building would be seen in the wider backdrop of the school from Aldgate High Street beyond Aldgate Square. In baseline views the proposed development would integrate into the medium scale of foothills to the City Cluster as part of the existing modern context and would not be harmful to its setting or significance. In cumulative scenarios the proposed development with the consented 19 storey Bevis Marks House would consolidate the backdrop of lower taller buildings without altering the aspects of setting which contribute to heritage significance. The proposed building is not considered to harm the setting or significance of The Aldgate School and would form part of the neutral modern background buildings within the wider setting.

Holland House: grade II*

180. Offices of 1914-16, a rare example of the work of Dutch architect H.P. Berlage in Britain. Built for a Dutch shipping company, the building is a striking landmark, particularly in its use of grey-green faience materials and subtle nautical theming. The building's grade II* listing reflects its very high degree of both architectural and historic significance. It is unique in the city as an example of a skilfully crafted, fully faience-fronted building by a highly regarded Dutch architect whose work is rare in Britain, constructed in the middle of the First World War when building work had virtually ceased, employing novel forms of design such as steel-framing, a proto-atrium and as such pointed to the future of the office building. As well as the principal frontage, high architectural interest is found in the tiled interiors of the building at basement and ground floor levels, which survive as designed by Berlage to a high degree of intactness.

181. The backdrop to the listed building's principal elevation is open sky. The building remains part of a street block of a comparable scale and density to when it was originally constructed, and this immediate setting contributes to the building's significance. It originally formed part of the frontage to one of the narrowest streets in the City located opposite the former Baltic Exchange. It was designed to address the narrow street

and the lustrous, exquisite faience and projection of the closely spaced chamfered piers made the building appear solid in oblique views despite being highly glazed. Following damage caused by the 1992 IRA Bomb, the Baltic Exchange was demolished and replaced by the Gherkin in 2004, opening longer views of Holland House across the north-east and south-east corners of the new Gherkin piazza – but this was not how the building was originally designed to be seen and these views do not contribute significantly to the significance or appreciation of the listed building.

182. There would be no visual impact on the listed building as appreciated across the piazza at the base of the Gherkin, but the proposed development would be seen in oblique views of the listed building from Bury Street and would terminate views northward. This visual experience would be within the context of the taller modern buildings which do not currently contribute to the significance of the listed building. In cumulative scenarios the consented 19 storey Bevis Marks House would conceal the proposed development and would consolidate the backdrop of lower taller buildings without altering the aspects of setting which contribute to heritage significance. The proposed building is not considered to harm the setting or significance of Holland House.

Church of St Katharine Cree: grade I

183. Church of 1631 with a tower of c.1504; a rare example of a 'Laudian' church of the Caroline period; an exceedingly rare example of the early use, internally, of classical architectural motifs alongside perpendicular gothic features. The building is therefore of exceptional architectural and historic interest, with the enclosed churchyard to the north-east contributing to its significance.

184. The church is located on the south-west corner of the street block in a characterful immediate setting of masonry warehouse buildings and offices with terracotta decorative flourishes. These prevailingly Victorian and Edwardian buildings form a cohesive townscape group, and this immediate historic setting contributes to the special architectural and historic interest and significance of the church; more widely, the church is seen in the context of larger modern buildings and the tall buildings of the City Cluster which do not contribute to the significance of the church, but which create an established, contrasting modern setting. The church is not listed as one of the City Churches with a Skyline Presence in Figure 11 of the City of London Protected Views SPD (2012).

185. The proposed building would appear in views of the church from Leadenhall terminating Creechurch Lane and would appear visibly distant and significantly lower than the church which would remain the focus of the view. The proposed development would also be seen in the context of the tall buildings on the eastern edge of the City Cluster. The proposed development would change the wider setting of the church but distinct from the church and its more historic setting. The legibility of the medieval tower within the streetscape of Leadenhall and the elements of setting which contribute to setting and appreciation of significance would not be altered. In cumulative scenarios the proposed development 19

storey Bevis Marks House would conceal the proposed development and would consolidate the backdrop of lower taller buildings also without altering the aspects of setting which contribute to heritage significance. The proposed building is not considered to harm the setting or significance of the Church of St Katherine Cree.

Church of St Botolph Aldgate: grade I (and associated grade II listed street furniture)

186. Church of 1744, of stock brick with classical stone detailing and a distinctive obelisk tower. The churchyard, railings and associated drinking fountain and police call box all positively contribute to the building's setting and significance and form a boundary which reinforces its visual prominence in the townscape. The church's setting is further enhanced by the open space of Aldgate Square to the west and the group relationship with the Aldgate School. The setting is otherwise characterised by modern commercial buildings of medium scale in the City and Tower Hamlets, with the tall buildings of the Cluster set some distance away to the west which do not contribute to the significance of the listed building but have created a now established contrasting modern setting.

187. The landmark spire is identified as contributing to City's skyline in the CoL Protected Views SPD. The proposed building would be glimpsed beyond the church in relation to taller background buildings to the west the proposed development would comfortably consolidating the multi-layered backdrop of the church seen from Minories and Aldgate Square without appearing dominant and the spire would remain visually prominent and undiminished. The tall modern character of the wider setting to the west of the church would not be altered and the ability to appreciate the church's heritage significance would not be affected. In cumulative scenarios the proposed development with 19 storey Bevis Marks House would consolidate the backdrop of lower taller buildings without altering the aspects of setting which contribute to heritage significance. The proposed building is not considered to harm the setting or significance of the Church of St Botolph Aldgate.

Church of St Botolph Bishopsgate: grade II*

188. The origins of the church are 12th century, but it was rebuilt 1725-29 and extensively restored following bomb damage 1947-8 and 1990s. The building has special architectural and historic interest for its age and rarity and its association with both James Gould and George Dance the Elder renowned Georgian architects. The church has strong townscape and landmark presence and is identified as a building with City Church with skyline presence in CoL SPD Protected Views SPD.

189. The setting is varied and contrasting and characterised by Bishopsgate Conservation Area and the old churchyard to the south. These positively relate to the historic finer urban grain in which the church once existed and define a formal perimeter reinforce the buildings status. The wider setting is defined by the tall buildings of the City Cluster particularly Heron Tower and 1 Bishopsgate Plaza, 100 Bishopsgate and 99

Bishopsgate which do not contribute to the significance of the church, but which create an established, contrasting modern setting.

190. The proposed building would have limited juxtapositions with the listed church although there would be visibility from Bishopsgate in front of church and in aligned views from the churchyard looking east but this visual experienced would be within the context of Heron tower and 1 Bishopsgate Plaza. The tall modern character of the wider setting to the east of the listed building would not be altered. In baseline and cumulative scenarios including with 1 Undershaft there would be a consolidation of the established modern tall building setting of the building without diminishing the ability to appreciate the heritage significance of the listed building. The proposed building is not considered to harm the setting or significance of the Church of St Botolph Aldgate.

191. The proposed building is not considered to harm the setting or significance of the Church of St Botolph Bishopsgate.

Port of London Authority's Warehouses and boundary walls to Middlesex Street and New Street: grade II

192. The merchants of the East India Company began trading in 1600 and by the 1820s they occupied large storage warehouses to the northeast of the city adjacent to the late 17th entry Devonshire Square. The site was redeveloped in 1978-82 with 4 out 7 of the warehouses preserved as part of the development. The surviving listed warehouses date from the late 18th century and form a large irregular group of plainly detailed 6 storey buildings of pinkish/yellow brick with Portland stone dressings around enclosed and partially enclosed courtyards. The block facing Devonshire Square has an arcaded base and stone banding. The buildings have architectural and historic interest particularly for their association with East India Company and with the Port of London Authority. The warehouses are early examples of purpose-built warehouses and express the standards of architecture that applied to this typology of architecture at the time with formal classical compositions. T

193. The setting of these listed structures is as a series of complex of warehouses and smaller domestic buildings which have visual and functional relationships with one another and form an irregular but cohesive townscape group contained within a defined boundary with distinct interconnecting spaces. The spaces between the buildings are historic and central to the significance of the former trading and industrial past including Central Courtyard and The Avenue. The 1980s remodelled and rebuilt part of the Cutlers Gardens Estate by Richard Seifert are integral to setting and contribute to the historic evolution and so significance of the wider campus of listed buildings

194. To the west is the Georgian planned Devonshire Square, historic terraced buildings and the southern part of the Bishopsgate Conservation Area and New Street. These elements of setting relate to the significance of the warehouses and as part of the established urban

grain and the evolution of the area as a place of trading and support evidential, architectural, and historic values.

195. The broader setting is varied and does not contribute to significance comprising to the south modern midrise commercial buildings including the proposed development site and beyond this are the taller buildings of the City Cluster. To the east is Harrow Place and Middlesex Street Estate 1965-1975 with Petticoat Tower.

196. The proposed development would not impact on the historic visual or functional relationships between the warehouses as a group or affect the wider setting of Devonshire Square or Bishopsgate Conservation Area. The development would have a significant background visual presence as experienced in southerly views from The Avenue and Central Courtyard complex and experienced from Devonshire Square to the west. The juxtaposition would be striking but not adverse and the stepped massing, solidity of materials, warehouse metal bays, articulation and urban greening would comfortably transition the change in scale from 6 storey warehouses to the 18/24 cascading storey development. The public realm and the ground floor functions would add vibrancy to the existing commercial character of the warehouses and semi-public spaces between the buildings.

197. The proposed development would also be experienced in the wider setting of the existing taller buildings which form a modern backdrop. The ability to appreciate the historic formal composition and classical details of the warehouses and the boundary wall and the cohesive grouping and inter- relationship between the blocks would not be diminished. The elements of setting that contribute to the warehouses setting would not be altered. In terms of cumulative scenarios 1 Undershaft and 100 Leadenhall Street would increase the visual impact of the southerly setting of the listed buildings consolidating the taller buildings of the City Cluster and increasing its scale. There would be change to the wider setting with the proposed development, but this would not diminish the impact on the ability to appreciate heritage significance. The proposed building is not considered to harm the setting or significance of the Port of London Authority's Warehouses and boundary walls to Middlesex Street and New Street.

<u>House to east of entrance to Port of London Authority's Warehouses: Grade II</u>

198. These 3 storeys plus basement is in yellow brick with painted dressing and dates from 1806 as part of the East India Company warehouse development and this has historic and architectural interest. Together with the pair of houses opposite the building bookends the entrance into the warehouse complex and have historic and architectural interest.

199. The setting of this house is the wider complex of warehouses and other domestic buildings which have visual and functional relationships with one another and form an irregular but cohesive townscape group contained within a defined boundary with distinct interconnecting spaces. The spaces between the house and warehouses buildings are historic and central to the significance of the former trading and industrial past

including Central Courtyard and The Avenue. The historic piers flanking the entrance to The Avenue are central to the setting. The 1980s remodelled and rebuilt part of the Cutlers Gardens Estate are integral to setting and contribute to the historic evolution and so significance of the wider campus of listed buildings

200. To the west is the Georgian planned Devonshire Square and southern part of the Bishopsgate Conservation Area and New Street. These elements of setting relate to the significance of the warehouses and as part of the established urban grain and the evolution of the area as a place of trading and support evidential, architectural, and historic values.

201. The broader setting is varied and does not contribute to significance comprising to the south modern midrise commercial buildings including the proposed development site and beyond this are the taller buildings of the City Cluster. To the east is Harrow Place and Middlesex Street Estate 1965-1975 with Petticoat Tower.

202. The proposed development would not impact on the historic visual or functional relationships between the domestic house and the wider grouping of listed buildings as a group or affect the wider setting of Devonshire Square or Bishopsgate Conservation Area. The development would have a significant background visual presence as experienced in southerly views from The Avenue and Central Courtyard of the Devonshire Square complex. The juxtaposition would be striking but not adverse and the stepped massing, solidity of materials, warehouse metal bays, articulation and urban greening would comfortably transition the change in scale from 3 storey building to the 18/24 cascading storey development. The public realm and the ground floor functions would add vibrancy to the existing commercial character of the warehouses and semi-public spaces between the buildings.

203. The proposed development would also be experienced in the wider setting of the existing taller buildings which form a modern backdrop. The ability to appreciate the historic formal composition and classical details of the warehouse and the boundary wall and the cohesive grouping would not be diminished. The elements of setting that contribute to the warehouses setting would not be altered. In terms of cumulative scenarios 1 Undershaft and 100 Leadenhall Street would increase the visual impact of the southerly setting of the listed buildings consolidating the taller buildings of the City Cluster and increasing its scale. There would be change to the wider setting with the proposed development, but this would not diminish the impact on the ability to appreciate heritage significance. The proposed building is not considered to harm the setting or significance of House to east of entrance to Port of London Authority's Warehouses.

<u>Pair of houses at north of entrance to Port of London Authority's Warehouses: Grade II</u>

204. These houses date from 1786-7 as part of the East India Company warehouse development and with the east entrances house bookend the entrance into the warehouse complex and have historic and architectural

interest. Together with the east entrance house the buildings bookend the entrance into the warehouse complex and have historic and architectural interest.

205. The setting of this house is the wider complex of warehouses and other domestic buildings which have visual and functional relationships with one another and form an irregular but cohesive townscape group contained within a defined boundary with distinct interconnecting spaces. The spaces between the house and warehouses buildings are historic and central to the significance of the former trading and industrial past including Central Courtyard and The Avenue. The historic piers flanking the entrance to The Avenue are central to the setting. The 1980s remodelled and rebuilt part of the Cutlers Gardens Estate are integral to setting and contribute to the historic evolution and so significance of the wider campus of listed buildings

206. To the west is the Georgian planned Devonshire Square and southern part of the Bishopsgate Conservation Area and New Street. These elements of setting relate to the significance of the warehouses and as part of the established urban grain and the evolution of the area as a place of trading and support evidential, architectural, and historic values.

207. The broader setting is varied and does not contribute to significance comprising to the south modern midrise commercial buildings including the proposed development site and beyond this are the taller buildings of the City Cluster. To the east is Harrow Place and Middlesex Street Estate 1965-1975 with Petticoat Tower.

208. The proposed development would not impact on the historic visual or functional relationships between the domestic house and the wider grouping of listed buildings as a group or affect the wider setting of Devonshire Square or Bishopsgate Conservation Area. The development would have a significant background visual presence as experienced in southerly views from The Avenue and Central Courtyard of the Devonshire Square complex. The juxtaposition would be striking but not adverse and the stepped massing, solidity of materials, warehouse metal bays, articulation and urban greening would comfortably transition the change in scale from 3 storey buildings to the 18/24 cascading storey development. The public realm and the ground floor functions would add vibrancy to the existing commercial character of the warehouses and semi-public spaces between the buildings.

209. The proposed development would also be experienced in the wider setting of the existing taller buildings which form a modern backdrop. The ability to appreciate the historic formal composition and classical details of the warehouse and the boundary wall and the cohesive grouping would not be diminished. The elements of setting that contribute to the warehouses setting would not be altered. In terms of cumulative scenarios 1 Undershaft and 100 Leadenhall Street would increase the visual impact of the southerly setting of the listed buildings consolidating the taller buildings of the City Cluster and increasing its scale. There would be change to the wider setting with the proposed development, but this would not diminish the impact on the ability to

appreciate heritage significance. The proposed building is not considered to harm the setting or significance of the pair of houses at north of entrance to Port of London Authority's Warehouses.

Gate piers to entrance to Port of London Authority's Warehouses: Grade II

210. These are plain gate piers of Portland Stone dating from 1806 and have historic and architectural interest and are intrinsic to the wider Devonshire Square warehouse and domestic buildings now forming part of Cutlers Garden Estate.

211. The proposed development would not impact on the historic, visual, or functional relationships between the gate piers, townhouses and the warehouses as a group or affect the wider setting of Devonshire Square or Bishopsgate conservation Area. The development would be a significant background visual presence as experienced in southerly views from The Avenue and Central Courtyard of the Devonshire Square complex. The juxtaposition would be striking but not adverse and the stepped massing, solidity of materials, warehouse metal bays, articulation and urban greening would comfortably transition the change into the finer urban grain of the warehouse complex.

212. There would be change to wider setting with these baseline and cumulative scenario but there would be no resulting impact on the ability to appreciate heritage significance. The proposed building is not considered to harm the setting or significance of the Gate piers to entrance to Port of London Authority's Warehouses**.**

Nos 12 and 13 Devonshire Square: grade II

213. These substantial houses are the oldest in Devonshire Square and occupy the northeast corner. Each house is 4 storeys plus basement and are yellow brick and 4 windows wide. They have historic and architectural interest for their age and rarity and make an important contribution to the townscape and Devonshire Square as a Georgian historic planned square. These are good examples of mid Georgian houses.

214. The setting is varied and elements which contribute are the Bishopsgate Conservation Area in which the buildings are located. The east is dominated by the historic warehouse buildings now the Cutlers Garden Estate complex. The west and north are more residential and modest in scale also consistent with the listed buildings. These elements in terms of urban grain, alignment, and relationship to historic street patterns all reinforce the historic and architectural values of the listed buildings. On the south side is the post war substation designed to be sympathetic to the square. The square itself contributes to the appreciation of the listed buildings significance and provides evidence of the original formal layout. There is a clear wider modern setting of City Cluster as well as taller buildings to northeast and the Middlesex Estate which are part of the established setting by do not contribute to significance.

215. The proposed development would not be visible from this northeast corner of Devonshire Square and therefore the most significant views of

the listed pair looking north across the square in the context of the formal layout and historic character of Devonshire Square. Due to the location of the development, there would be no interface with the listed buildings as the development would be behind the viewing experience and not visible and therefore significance would not be diminished.

216. The impact of the proposed building in baseline and cumulative scenarios due to the locations would not result in any impact or effect on the ability to appreciate heritage significance. The proposed building is not considered to harm the setting or significance of the 12 and 13 Devonshire Square.

Other listed buildings

217. The impact of the proposal on the settings of the listed buildings has been assessed in the THVIA including St Helens Bishopsgate (grade I); Guild Church of St Ethelburga the Virgin; (grade I); Wall to the rear of Nos 14-18 Devonshire Row (grade II); and Shield House, New Street (grade II) and 38 St Mary Axe (grade II). The settings and the contribution these makes to significance of these 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; the presence of other tall buildings that characterise the existing emerging settings; and existing built fabric blocking the view of the proposed development in the backdrop. The THVIA assessment that the effect on significance and setting would be neutral or minor is concurred with, and the proposed development would not harm the setting or the contribution that the setting makes to the significance of these listed buildings.

Impact on significance and setting of Conservation Areas

<u>Bishopsgate Conservation Area</u>

218. This lies to the northeast of the City and includes Liverpool Street. It is characterised by Bishopsgate as the major route with streets leading east and which are developed by smaller scale buildings of Victorian, Edwardian, and Georgian periods. The area has a dense urban grain formed by a network of historic streets, lanes and alleys overlaid with Georgian town planning and Victorian railway infrastructure. It is a distinct area in terms of buildings scale and diversity of use with contrasting large scale office buildings to the north, south and west. The northern half of Bishopsgate in the conservation area are framed by Broadgate Estate.

219. The proposed development would be impactful on the Bishopsgate Conservation Area which is close to the site particularly from Devonshire Square and its southern easterly setting but would also be glimpsed from Liverpool Street, from the entrance of Liverpool Street Station and from Bishopsgate to the north of the station. The city cluster is within the periphery and backdrop of the southern aspect of the Square but the proposed development would bring the northerly fringe closer to the conservation area.

220. From Devonshire Square the scale of the proposed development would be seen in relation to existing tall building in the city cluster appearing at an equivalent height beyond the square in its close setting to the south. The development would not make a fundamental change to the character and quality of the existing established southerly setting which is distinctly taller and modern. The proposed development would consolidate the lower northern edge with a book end building and would reinforce the dramatic contrasts of old and new which characterise the city and the setting of the Conservation Area. The legibility of the formal historic layout of Devonshire Square and the fine urban grain would be unaffected, legible and preserved. Because of its established close southerly setting visibility of a new tall building is not considered to be inherently harmful to the appreciation of the heritage significance of this part of the conservation area. In all other glimpses the visual impact to setting would be negligible integrated into an urban layering experience.

221. The character and appearance and quality of the visual setting of this part of the conservation area would be preserved. In both baseline and cumulative scenarios, the development consolidates the d tall building backdrop and wider setting and there would be no impact on the ability to appreciate the heritage significance of this part of the conservation area. The proposed enhancements to public realm would add vibrancy to this fringe of the Conservation Area or its setting.

St Helens Place Conservation Area

222. This is a small and tightly defined Conservation Area on the east side of Bishopsgate located to the southwest of the site. The Conservation Area is enclosed by Bishopsgate to the west, Church of St Helen Bishopsgate to the south and the property boundaries of St Helen's Place to the north and east. The conservation areas provide a close setting for St Helen and Guild Church of St Etheblurga the Virgin which define the character and appearance. St Helen is the only survivor of the intricate layout of medieval spaces and alleys which connected Bishopsgate and St Mary Axe. The privately owned St Helen's Place is the centrepiece as a planned enclave of twentieth century buildings which are secluded and dignified. The setting of the conservation area is defined by tall buildings in all directions which do not detract from the intimate, quiet and distinctive character and appearance of the Conservation Area.

223. The proposed development would have a negligible impact and it would be almost entirely concealed by foreground buildings. The character and quality of the visual setting of the conservation area would be preserved in both baseline and cumulative scenarios there would be no impact on the ability to appreciate the heritage significance of the designated heritage asset or its setting.

Wentworth Street Conservation Area

224. This is within the London Borough of Tower Hamlets. It is located to the northeast of the site. It is an area with a fine urban grain which special architectural and historic interest due to its rich history dating from 19th

century. The area has a mediaeval street pattern of yards and alleys which is still evident. The area is characterised by markets and associations with the clothing industry and wave of immigration which make it a culturally diverse part of London.

225. The south-eastern setting of the conservation is defined by the backdrop of the change in scale between the 19th century street network and the distant very tall buildings of the city and the foothills to the city cluster.

226. In views from Wentworth Street and Cobb Street the proposed development would bring the northern edge of the foothills closer to the Conservation Area and partly conceal taller buildings beyond. The distinct cascading northeast elevation and green crown would step the scale down from south to north. The well-articulated distinctive form would enhance the character and quality of this northern edge of the city cluster and foothills in approaches through the conservation area.

227. The character and quality of the visual setting of the conservation area would be preserved in both baseline and cumulative scenarios which would consolidate the city cluster and tall building backdrop and wider setting and there would be no impact on the ability to appreciate the heritage significance of the designated heritage asset or its setting.

228. No objections have been received from the London Borough of Tower Hamlets.

Non-designated heritage assets

The Rabbi's House

229. The Rabbi's House adjoins Bevis Marks synagogue to the southeast and presents a simple frontage to the synagogue courtyard of stock brickwork and stone dressings. Its more architecturally significant elevation is that to Heneage Lane, of red brick and Mansfield stone dressings incorporating Tudor inspired detailing. It possesses a high level of historical significance for its associations with the synagogue and a moderate level of architectural significance for its well-composed, high-quality elevations. The building's setting as part of the synagogue complex contributes highly to its significance. The proposed development due the distance, height and location would not interface with the non-designated heritage asset and there would be no impact on the ability to appreciate significance.

Devonshire Square

230. This is important in terms of historic town planning being the sole historic planned square in the Bishopsgate Conservation Area, its formal layout is in marked contrast to the irregular parts of many other parts of the area. The square was originally developed in the late 17th century as part of the site of Earl of Devonshire's House. The square itself has been remodelled but as a space it has distinct historic references reflecting the former historic layout. The setting still has a strong sense of enclosure on three sides which frame a rectangular open space and includes a number of listed buildings 12 and 13 Devonshire Square and part of the imposing Cutler Street Port of Authority Warehouses complex. This has

a key amenity value as a relatively quiet place for people to sit in away from the bustle and noise of Bishopsgate. The Square opens up on its eastern side on the boundary due to the Metropolitan line under the square and the destruction of the south side of the square in WWII.

231. The southwest is defined by the midrise Premier Place and taller buildings that are experience beyond. This wider setting does not contribute to the historic elements of the square or its significance.

232. The development would be impactful and visible beyond Premier Place and higher than neighbouring building and those in the immediate context. The experience would vary in the space depending on positioning. The form of the top of the building would step down from south to north and this cascading silhouette would be a strong visual backdrop to the setting of the non-designated heritage asset. The taller element would read in relation to other buildings within the foothills and taller buildings within the cluster and therefore there would not be a fundamental change to the setting of the square but within the wider taller building context. The cascading form, urban greening and intricate detailing of the architecture and references to the warehouse typology would provide visual interest and vibrancy and present a sophisticated building form. The more solid materiality of terracotta would contrast with the glassy building which characterises the City Cluster. In terms of form and tiered massing the development would successfully mediate the change in scale required by the contrasting city contexts.

233. The development is some distance from the non-designated heritage asset. The setting of the southeast context would change but the overall significance of the space and its important historic and evidential values would not be diminished and would remain unchanged.

1 Devonshire Square

234. The former Bank of Ceylon is a red brick former warehouse on the corner with Devonshire Row with strong painted stone base and brickwork above four storeys plus basement and mansard roof characterised by vertical windows, neoclassical proportions and, cornice line and lightwell with railings. Its significance lies in its contribution to the wider historic terrace buildings enclosing the west and northern aspects of the Georgian planned historic Devonshire Square. The location and orientation of the proposed development located to the southeast of the building behind the viewer and therefore would not impact on the ability to appreciate significance.

2 Devonshire Square

235. This is a neo-Georgian building dating 1926 with the character of a townhouse, it is of red brownish red brick with chunky stone detailing including a large portico, rusticated base, window surrounds cornice and balustrade to the lightwell. Its significance lies in its contribution with other historic terrace buildings enclosing the west and northern aspects of the Georgian planned historic Devonshire Square. The location and orientation of the proposed development located to the southeast of the

building behind the viewer and therefore not impact on the ability to appreciate significance.

15 Devonshire Square

236. This is a Queen Anne style red brick building with substantial stone features and is eclectic in appearance. The facade is irregularly arranged with different designs for windows on each floor a tall wide entrance a door with projecting hood an egg and dart cornice supported on brackets with pilasters. Its significance lies in its contribution with other historic terrace buildings enclosing the west and northern aspects of the Georgian planned historic square. The location and orientation of the proposed development located to the southeast of the building behind the viewer and therefore would not impact on the ability to appreciate significance

Conclusion on Heritage Impact:

237. Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

238. Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset

239. Overall, the proposed development would preserve the special interest and settings of designated and non-designated heritage assets in the locality and comply with the NPPF, and relevant policies in the London Plan and Local Plan.

Other Strategic Views (Local)

The Monument to the Great Fire of London

240. The proposed building would fall outside the identified viewing cones from the Monument and would not harm or conceal views of important heritage assets. The proposed building would be completely obscured by taller buildings in the foreground in views from the north of the Monument viewing gallery. The proposed building would not harm or obstruct important views of the Monument from afar or in local views.

241. The proposal would not be in the 'Immediate Setting' of the Monument as defined in the Protected Views SPD and would be peripheral to wider views along street axes setting. The proposals would have a neutral impact on its setting in baseline and cumulative scenarios, causing no conflict with the Protected Views SPD guidance.

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

242. The proposed building would not be visible from the Processional Approach to St Paul's Cathedral on Fleet Street, Ludgate Circus or

Ludgate Hill. It would leave this kinetic townscape experience unaffected, in accordance with Local Plan Policy CS13 and draft City Plan Policy S13 and in guidance contained within the Protected Views SPD.

St Paul's Cathedral

243. The proposed building would be not 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.

244. From here, the proposed building would be concealed behind the existing City Cluster and no harm to this view would arise.

Views from other publicly accessible elevated viewing areas

245. Public elevated views from the upper storeys of buildings, which because they are freely available to the public have significant public benefits. Such areas are increasing in number and are proving to be highly popular and much-visited areas of elevated public realm, offering exceptional pan-city views.

246. Due to its height, the proposed building would not be visible from the free public terraces at Tate Modern, One New Change, 120 Fenchurch Street, 22 Bishopsgate. Where the proposals would be visible for example 1 Undershaft and 100 Leadenhall Street the largely planted roof of the fifth elevation would appear as a positive architectural addition to the urban layers at a significant lower level.

Other Local views

247. As a lower tall building, the development would be glimpsed in other views in the City and in the wider area of London. These have been assessed. The proposed building has been appropriately designed in relation to its surroundings and its quality design and appropriate massing would not detract from the visual amenity of other townscape views. The proposed building protects significant views of important buildings, townscape, riverscape and skylines and would not result in harm to the views identified in the Townscape, Built Heritage and Visual Impact Assessment and the settings and significance of the heritage assets and landmark buildings featured within these views would not be harmed by the proposals.

Public Realm

248. Local Plan policies DM16.2 will only permit the loss of a pedestrian route where an alternative pedestrian public route of at least the equivalent is provided. City Plan Policy DM10.1, DM19.1 and emerging City plan Policy HL1, DE3, London Plan Policy D8 all require high quality public realm and increased urban greening.

249. Currently, the existing public realm is poor quality, gloomy and is a place to walk through rather than linger. There are no active frontages, ill-defined entrances, the existing building over sails just 3.55m above narrow pavements and there is no soft landscaping or places to sit.

250. Clothier Street is existing highway in the centre of the site and this is a refuse and service yard cul de sac as well as pedestrian route. Private areas within Clothier Street are used for car parking. The public highway terminates at a discreet pedestrian passage, connecting to Cutler Street West across privately maintained permissive path. Clothier Street includes dead corners and recesses and is not a meaningful or pleasant public space. Clothier Street experiences much lower footfall than the surrounding streets (in the 2019 baseline PM peak hour flows are; Cutler Street N: 1746, Cutler Street W: 1248, Houndsditch: 1836, Clothier Street: 42**;** in a future baseline scenario (without development) PM peak hour flows are expected to be; Cutler Street N: 2100, Cutler Street W: 1350, Houndsditch: 2850, Clothier Street: 50)

251. The application proposes an increase in quantity and quality of public realm. The perimeter spaces wrapping around the building would be outward facing, attractive and accessible spaces. There would be a net gain of approximately 173sqm of new public realm and 27sqm of public highway land.

252. Pedestrian comfort levels would be enhanced, with pavements widened to provide a 2m clear footways to facilitate movement around the site with additional space extending up to between 3.9m and 7.4m to provide space to dwell. This would secure at least “A-” PCL-rated pedestrian routes along Houndsditch Street, Cutler Street (West) and Cutler Street (North). This would support and enhance permeability and pedestrian movement along important strategic routes and aligns with the City of London’s Eastern Cluster Vision. The development would enhance an existing network of streets and desire lines and in particular the north/south route through this part of the city from St Mary Axe and on to Devonshire Square, Harrow Place and Petticoat Lane Market. The widened pavements also allows opportunities for: realigning the street edges; small street trees; planting; and seating as well as incidental pop up activity. The thermal and pedestrian comfort of these spaces to enjoy sitting and lingering this is addressed in the relevant sections of this report. Importantly, the new public realm on Cutler Street will improve visual and pedestrian connectivity between the City Cluster and the communities and areas (including Petticoat Lane market) to the north.

253. The proposed set back of the building line and column free raked base would increase the width of Cutler Street (west) from 7.5m to 11.5m and lift the overhang of the building to 7m. The existing building oversails approximately 100 m2 of the narrow footways on Houndsditch, Cutler Street West and Cutler Street North and 90sqm over Clothier Street. The proposed development would oversail 108m2 of existing highway and 380m2 of land proposed to be dedicated as public highway. This increase needs to be assessed qualitatively. The raked based and increased publicly accessible public realm would increase sunlight to ground and create a more open aspect and reduce the existing sense of enclosure particularly to Cutler Street (West)

254. Further enhancements to the overall street environment as a user include raised table to Cutler Street (West) and finishes to encourage

traffic calming. Servicing would be consolidated and contained within the new development, reducing vehicle numbers travelling to and from the site and using the kerb side.

255. The enhanced public realm would have a clear connection with the architecture of the building and as a place to walk through and spend time would be comfortable, inviting, attractive and inclusive and enable opportunities for social interaction. The base of the building would integrate 46 high and low permanent seating spaces interspersed with a green edge of planters positioned playfully to create intimacy and more sheltered experiences for users as well reinforcing a focus on the location of entrances on the corners and to the community use to the north. Materials comprise terrazzo and York stone and are designed to complement the City of London palette. The planters are designed as hyper flexible features integrating infrastructure to enable permanent and temporary installations within the niches to support pop up market stalls or gazebos for events which could further add to vibrancy of the street or complement the proposed retail offer as well as improve the connections through to and support the vibrancy of Petticoat Market. Opportunities for free storage space has been identified on site within the development at lower ground level for both traders of Petticoat Lane Market and the potential pop ups and kiosks along Cutler Street West. This will be detailed within the S106 and would be subject to demand and include locations, capacity, and hours of access.

256. The integrated planting to the ground floor public realm would be designed to more domestic rather than corporate and would be seasonal and selected to respond to specific microclimate conditions. Ginkgo trees are the proposed species of street tree on Cutler Street North, Cutler Street West and Houndsditch. The trees would sit in the middle of the new footway due to the presence of a number of services below the existing footway. The impact of their location on pedestrian movement has been assessed and is considered acceptable, further detail can be found in the Transport and Highways section of this report.

257. These trees would be maintained by the applicant, the management of which would be secured through the S106 agreement. The proposed street trees and their maintenance arrangement has been discussed and agreed with officers in the Open Spaces division.

258. The proposed street lighting is designed in accordance with the Lighting Vision for the City of London. The existing two streetlights and public realm lighting would be integrated into the building soffits and facade allowing for a clutter free public realm. The street lighting would be managed by the City Central Management System.

259. The final details of the public realm including planting, materials, lighting, and management would be subject to conditions, S106 and S278. The overall vision for the public realm and the dynamic with the base of the building would positively transform the existing public spaces in terms of experience and is considered to be significantly superior to the existing Clothier Street and public realm. The overall outcome would cultivate a vibrant and inclusive space which could be used flexibly with

opportunities for kiosks and pop up activities and would support the recovery aspirations for City. These elements of the proposal represent good place making and there would be gains quantitively and qualitatively compliant with the NPPF design policies, London Plan policies, Local Plan policies, Draft City Plan policies, and the City Public Realm SPD.

Suicide Prevention

260. Suicide prevention has been considered as part of the application. A condition is recommended requiring further details of measures to prevent jumping or falling from the development.

Cultural Strategy

261. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 policy S6 encourage new cultural experiences and art works and requires major development to provide a Cultural Plan. The City of London Cultural Policy seeks to improve the City's public realm, open spaces and gardens to make them more open, distinct, welcoming and culturally vibrant. The site is located close to the south-eastern edge of the City and the proposal incorporates several elements which will improve the cultural enjoyment of the site.

262. The Applicant has submitted a draft Cultural Plan in accordance with draft City Plan Policy S6 and this includes various components: community space; flexible public realm; affordable retail unit; affordable incubator space; and cultural commissions.

263. A dedicated 238sq.m community space is proposed and the initial proposal for this space is a cultural and social platform. The "Growing Community" proposals have been based on research, creative development, and community consultation. Further details of the consultation are contained with the Statement of Community Engagement within the report but has included local community groups, key stakeholders in the City of London and in neighbouring Boroughs. The proposals would offer a new urban green hub supporting local community green initiatives including local gardening opportunities and landscaping services. The hub space would occupy a prominent position on the northeast corner of the site at a nodal point and be outward facing to Middlesex Estate. Urban greening underpins the overall proposals, and the space and functions would complement existing neighbourhood activity and drive forward environmental agendas.

264. The space would be a dedicated two level community space within the building off Cutler Street (North) with generous ground floor frontage and fully accessed at street level creating a space for curated programmes focussed on gardening and green initiatives celebrating community projects designed for local groups including schools and charities for free. This may incorporate a green café and gardeners store uses adding to the activation of the proposed public realm.

265. The community space would include a stair, accessible wc, kitchenette and platform lift. The flexibility of space has been tested at application stage to ensure it could be use in an adaptable way depending on the

final partnership agreement including the number of users that could be supported at a single time.

266. The space will be available for use, free of charge for registered education providers, community groups and charities between 7am - 10pm on weekdays and between 10am - 6pm at weekends.

267. The key benefits include:

- activation of a new public realm
- bringing people together through shared interests
- provide a cultural programme of activities
- practical opportunities for learning skills and employment

268. The delivery of these proposals would be locked into a S106 through an operator and management plan including: continued community engagement; space dimensions; facilities; fit out; staffing; opening hours; marketing; promotions; activities; and programme; commitment for free access for agreed community groups and schools; and proposed rates for other users.

269. An affordable retail unit space (29sqm) with one of the proposed retail units being designed for use by micro retailers and a start-up and incubator/SME office space providing 23 desk spaces. These would be let at 50% market rates and the details would be secured within S106.

270. Integrated cultural commissions both permanent and temporary would accommodate art installations in the new public realm showcasing and working in partnership with local artists from diverse communities. This would be secured within the S106 and would set out the commissioning process and timescales for individual art pieces.

271. Opportunities for free storage space has been identified on site within the development at lower ground level for both traders of Petticoat Lane Market and the potential pop ups and kiosks along Cutler Street West. This will be detailed within the S106 and would be subject to demand and include locations, capacity, and hours of access.

Archaeology

272. The site is located outside and to the east of the Roman and medieval City wall and defences. It is an area of high archaeological potential where remains from the Roman, medieval and post medieval periods are likely to survive.

273. An archaeological Desk based Assessment and Archaeological Evaluation Phase 1 Report have been submitted with the application. Previous investigation on and in the close vicinity of the site have revealed the survival of Roman burials from the known Eastern Roman Cemetery. There is also evidence for Roman quarrying in this area. In the medieval period the area was occupied by tenements and workshops. The site was densely occupied with houses, warehouse and separated by narrow alleys in the later periods.

274. The buildings on the site have ground and basement floors at different levels which will have affected archaeological survival. Some areas

appear to be unbasemented and there is higher potential for archaeological survival here. Clothier Street was realigned as part of the 1980's developments on the site and crosses the former alignment of this street and the former Exchange Buildings – the areas which are unbasemented have potential for survival of remains of 18th and 19th century buildings and earlier medieval and Roman remains.

275. Proposed landscaping and tree planting in Cutler Street would involve groundworks outside the existing basements and is likely to have an archaeological impact.

276. A Phase 1 evaluation has been carried out in areas of the site which are currently accessible, and this will be followed by evaluation in the remaining areas. The evaluation showed that remains survived in the unbasemented area of Clothier Street and to a limited extent below basement levels. The results of this work will inform a programme of archaeological work to record remains which would be affected by the development.

277. The proposals are acceptable subject to conditions to cover archaeological evaluation, a programme of archaeological work and foundation design/

Transport and Highways

Public Transport

278. The site is highly accessible by public transport, with national rail services from Liverpool Street and Fenchurch Street stations within walking distance. Services on the Northern, Central, District, Circle, Metropolitan, Hammersmith and City lines, Docklands Light Railway and from 2022 the Elizabeth Line are available at Liverpool Street, Aldgate East, Bank, Tower Gateway and Tower Hill stations, all within walking distance of the site. Numerous bus services are available within walking distance of the site. As such the site records the highest possible Public Transport Accessibility Level (PTAL) of 6b. There are no cycle hire docking stations immediately adjacent to the site, the nearest being available approximately 150m away on Houndsditch.

Car Parking

279. 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.

280. The development would be car free except for 2 blue badge car parking spaces that would be provided at the basement level 4. Occupants and visitors to the site would have access to these parking spaces. 24-hour access to the blue badge parking spaces would be provided.

281. The blue badge parking spaces would be equipped with electric charging points. This will be secured by condition.

282. 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 5 informal private car parking spaces on Clothier Street would be removed.

Cycle Parking

283. 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.

284. 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
948	948	33	33

285. The cycle parking for the new office building would be accessed via two separate entrances, one from Houndsditch and one from Cutler Street North. Both entrances would occupancy prominent locations on the office frontage and provide a front of house arrival experience for people cycling.

286. 948 long stay cycle parking spaces would be provided at basement level 1. Access to the cycle parking would be provided via two lifts and two staircases located close to the entrances at ground floor level. A mix of cycle parking would be provided, including; 746 spaces on two tier racks, 108 spaces provided by Sheffield stands and 94 spaces for folding bicycles.

287. The Transport Assessment includes an assessment of the capacity of the lifts and staircases which demonstrates that the two staircases and two lifts could accommodate arrivals in a scenario with full occupancy of the cycle parking.

288. 21 short stay cycle parking spaces would be provided within basement level 1, accessed from the same lifts and staircases as the long stay cycle parking. This short stay cycle parking would be secure and sheltered from the elements.

289. 12 short stay cycle parking spaces would be provided in the public realm as 3 Sheffield stands close to the entrance on Houndsditch and 3 stands close to the entrance on Cutler Street North.

290. 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.

291. The proposals include 94 showers, and 948 lockers at basement level 1. 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 meet the London plan recommendations for the number of showers and lockers.

292. 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. It would be submitted to the City for approval in line with London Plan Policy T4 (Assessing and mitigating transport impacts).

293. In the plan, the applicant would be required to detail the arrival experience and how the visitor cycle parking would be highlighted as available for use by members of the public. 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.

Servicing and deliveries

294. 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.

295. Servicing would take place off-street accessed from Houndsditch which would limit disturbance to residents of the Middlesex Street Estate. 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 basement level 4 where the servicing area is proposed. The servicing area would accommodate 2 vehicles up to 7.75m in length. The servicing area would provide space for vehicles to manoeuvre and enter and exit the vehicle lifts from Houndsditch in a forward gear.

296. The servicing area would be equipped with electric charging points for delivery and servicing vehicles. This will be secured by condition.

297. Access for cargo bike deliveries is provided from Houndsditch.

298. 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.

299. The applicant is proposing to use an off-site consolidation centre to reduce the number of deliveries to the development per day. The applicant has agreed to a cap of 34 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.

300. 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.

301. 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 Storage

302. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.

303. The proposals incorporate a bin store at basement level 4. Waste would be expected to be collected daily, with the collection vehicle accessing the bin store via the proposed servicing vehicle lifts as detailed in the Servicing and Deliveries section above.

304. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facilities complies with their requirements.

Pedestrian Comfort

305. The Transport Assessment includes an estimation of trip generation for the existing and proposed developments. The proposed development would be expected to result approximately 2,575 trips in the AM peak hour and 2,575 trips in the PM peak hour.

306. The transport assessment has modelled the likely arrival routes for pedestrians based on spatial accessibility analysis which looks at spatial layout, land use and transport factors. 43% of pedestrian arrivals are predicted from Liverpool Street Station via Devonshire Row and Devonshire Square, 21% of pedestrian arrivals are predicted from Moorgate via London Wall and Houndsditch, 16% from Aldgate and Aldgate East via White Kennet Street and 6% of pedestrian arrivals from the site are predicted from Fenchurch Street via Houndsditch.

307. 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+.

308. A pedestrian comfort assessment has been conducted for the site. The assessment is based on pedestrian survey data was collected in

November 2019. A future scenario for 2030 has been assessed which includes proposed development trips and employment population growth.

309. Existing pedestrian comfort levels (PCL) are impacted by the narrow footways on Cutler Street North and West. The analysis shows that the proposed setting back of the building line would provide for minimum comfort levels of A- on Houndsditch, Cutler Street West and Cutler Street North. There are trees proposed in the middle of the footways on Houndsditch, Cutler Street West and Cutler Street North. The pedestrian comfort assessment demonstrates that these could be delivered while maintaining acceptable levels of pedestrian comfort.

310. A comparison of the pedestrian forecasts for the future baseline without development and the future baseline with development highlights that the proposed development would result in a significant increase in pedestrians using Devonshire Row, Devonshire Square and White Kennet Street to connect to the wider highway and public transport networks. The Pedestrian Comfort Level assessment predicts that the development would result in 1,350 additional pedestrians using Devonshire Square (a 58% increase) and 500 additional pedestrians using White Kennet Street (a 25% increase).

311. The pedestrian comfort level on Devonshire Row would fall from a B to a C+ in places without tables and chairs and from a C to a D where chairs are present. Devonshire Row is a pedestrian zone between the hours of 8am and 6pm, with no vehicular access permitted.

312. Devonshire Square and White Kennet Street both have narrow footways which are below 2m wide. As a result, sections of these streets achieve a PCL of F both before and after the proposed development flows are added. To achieve an acceptable level of pedestrian comfort following the increase in pedestrians generated by the development using Devonshire Square and White Kennet Street, pedestrian priority measures will be introduced, and this would be secured through a S278 agreement. Pedestrian priority means the streets would be designed so all vehicles, including cycles, will be expected to give way to people walking. Timed closures and access only restrictions will be explored through the S278 evaluation and design process. These works would be fully funded by the developers

313. Overall, the proposals would be considered to have an acceptable impact on pedestrians using the surrounding streets. The proposed set back of the building line would improve the streets immediately adjacent to the development and improvements to the wider walking environment secured through the S278 agreement would ensure that the increase in pedestrians travelling to and from the site could be accommodated while maintaining an acceptable level of pedestrian comfort.

Section 278 Agreement

314. 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 scope of the S278 agreement will cover Houndsditch, Cutler Street West, Cutler Street North, Devonshire Square and White Kennet Street as follows;

- Footway repaving on Houndsditch, Cutler Street West and North and any works required to integrate the proposed highway to be adopted into the existing highway
- Introduction of raised tables at junctions of Houndsditch and Cutler Street West, Cutler Street West and Cutler Street North, Cutler Street North and Harrow Place/ White Kennet Street
- Changes to carriageway treatment on Cutler Street West
- Pedestrian priority measures on Devonshire Square and on White Kennet Street between Harrow Place and Stoney Lane. 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 and would be subject to traffic order making procedures*
- The potential introduction of two-way traffic movement on Cutler Street North (subject to traffic order making procedures.

315. Through the evaluation and design process opportunities to improve the streets in line with the 10 healthy streets indicators, such as additional planting and seating, will be explored.

316. The equality impact section of this report has identified potential adverse impacts of the placement of street trees in the middle of the footway on blind and partially sighted people. The detailed design of the footways through the S278 agreement will ensure adequate tactile information and tonal contrast to warn blind and partially sighted people of the presence of the trees.

Stopping Up

317. A stopping up order would be needed to stop up the entire area of Clothier Street which would be built upon if the development was implemented. In total the applicant is proposed to stop up approximately 345sq.m of public highway.

318. The Court has authorized the Town Clerk to make stopping up orders that are not opposed, and he has delegated this authority to the Executive Director of Environment. Opposed stopping up orders are, however, reported to your Committee to determine.

319. Local Plan Policy DM16.2 – 2 states:

"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:

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

320. The proposal would result in additional footway being provided along the building frontage along Cutler Street North. Officers consider this additional footway provides greater value in terms of accommodating foreseeable future demands on the highway network. The route between Liverpool Street and Aldgate, via Devonshire Row, Devonshire Square, Cutler Street North and White Kennet Street, is popular with pedestrians and providing this additional space will help to accommodate future growth. Clothier Street would not be expected to see a significant increase in use in a future scenario without the proposed development.

321. Local Plan policy DM 16.2 – 3 states;

"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."

322. The heritage value of Clothier Street is assessed in the section entitled 'Demolition of the existing buildings and removal of Clothier Street'. The section concludes that the existing Clothier Street is a relatively modern construct and that the loss of Clothier Street would be acceptable in heritage terms.

323. Officers consider the proposed stopping up and replacement with a widening of the existing route along Cutler Streets North and West to be compliant with policy DM16.2.

324. A plan showing the area of highway proposed to be stopped up is included in appendix C. Any stopping up order would be subject to the order making procedures.

Adoption of Public Highway

325. The building line would be set back at ground floor level and an area of approximately 372sq.m would be adopted as highway maintainable at the public expense. A plan showing the area proposed to be adopted is included in appendix C.

Construction Logistics

326. 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

Access and Inclusivity

327. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and

DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy D5 of the London Plan.

328. The Proposed Development provides two accessible parking spaces at basement level 4, which are accessed via the dual use vehicle lifts on Houndsditch.

329. Separate accessible long stay cycle parking area would be provided at basement level 1, which would include dedicated accessible showers.

330. Glazed entrance doors would be situated immediately adjacent to the revolving doors, which would be automated and of equal importance as entrances to the building. All pass doors would be clearly sign-posted.

Security

331. 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.

332. Security measures around the development boundary to provide resilience against vehicle borne attacks have been developed in consultation with the Counter Terrorism Security Officers within the City of London Police. These measures would maintain a secure perimeter and increase stand-off, and include Hostile Vehicle Mitigation which has been designed into the public realm seating and planting strategy. The planters have been designed to provide most of the defences, however where maximum transparency to the facade is required at entrances and the service bay a number of bespoke bollards are proposed which would form part of the overall landscape design approach within the site boundary.

333. Further details of security mitigation measures would be secured by condition and through the Section 278 Agreement.

334. 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.

Energy and Sustainability

Circular Economy

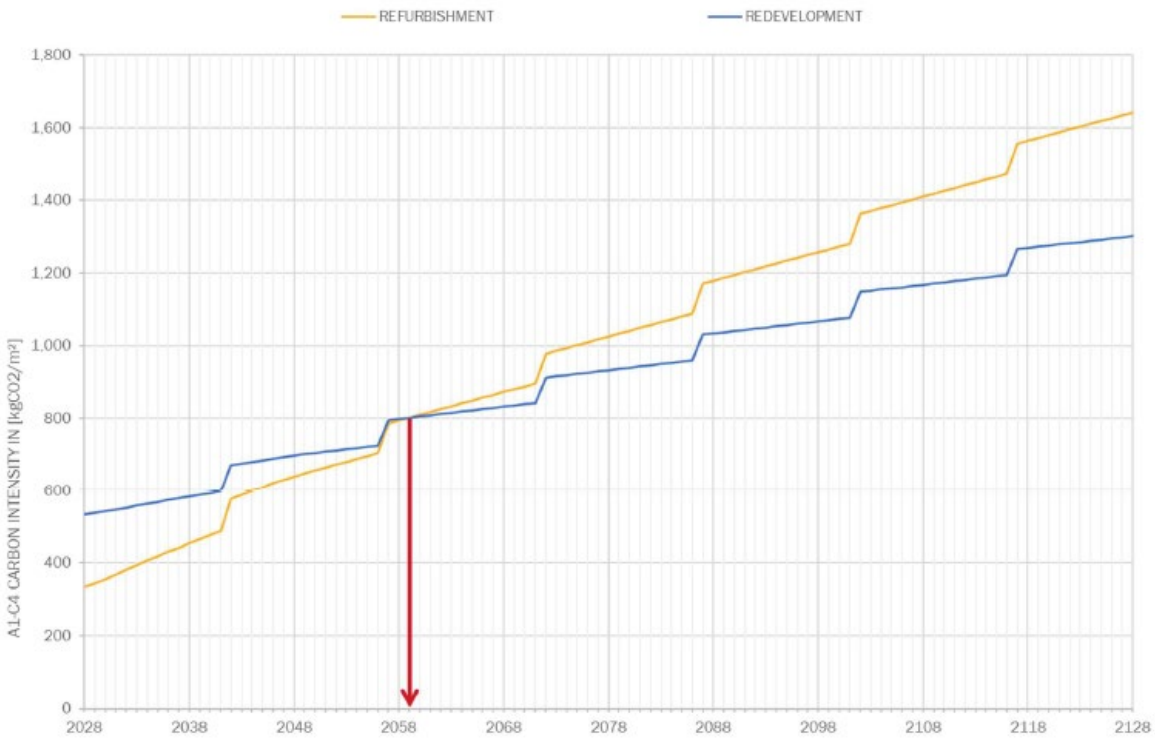
335. New London Plan Policy SI7 (‘Reducing waste and supporting the circular economy’) sets out a series of circular economy principles that major development proposals are expected to follow. Emerging City Plan 2036 Policy S16 sets out the City’s support for Circular Economy principles.

336. The submitted Draft Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions according to the GLA Circular Economy Guidance. The existing buildings on site were

not found to be technically suitable for refurbishment to accommodate the intended use of the building with the aspired quality and performance. The existing buildings do not have the necessary structural capacity as well as build-in adaptability and functionality normally expected of a modern building and therefore would lack potential to attract tenants and contribute to the prosperity of the area.

337. This evaluation has been underpinned by a study to assess a refurbishment option with a 2-storey extension that can be supported by the existing structure and that incorporates a ratio of retention and alterations to existing building elements and to new services with the best possible, balanced outcome with respect to embodied and operational carbon emission savings. This option was compared to the submitted redevelopment option (per square meter), and the study concludes, that over the lifetime of the building of 100 years considerable Whole Life Cycle carbon emission savings can be achieved, with a carbon savings advantage per square meter of floorspace of the redevelopment over the refurbishment likely after 30 years. A further option, assuming a much larger extension, would incur higher upfront embodied carbon emissions closer to the level of the redevelopment option due to required structural strengthening works and, compared to the redevelopment option, would not provide a high level of circularity benefits in terms of adaptability, flexibility and disassembly.

338. The applicants have presented the comparison of the Whole Life-cycle carbon emissions of the refurbishment option (with a 2-storey extension) and the proposed redevelopment option per square meter in the following graph (refurbishment in yellow; redevelopment in blue):



339. The applicants are committed to consider opportunities to recover the ‘residual value’ of the building’s materials for reuse and recycling wherever possible. The strategy has been informed by a pre-demolition audit.

340. The development adopts a circularity strategy that includes:

- Retaining part of the perimeter basement walls, and reuse of suitable demolition materials and recycled aggregates in concrete
- Incorporating low carbon materials
- Procuring steel with maximum recycled content
- Using cement replacement products
- Using responsibly sourced and certified materials
- Complying with the GLA targets on the recycling, reuse and diversion from landfill of all waste associated with the building works
- Prioritising pre-fabricated products, unitised façade construction and bolted structural connections to enable material efficiency and layer independence to aid future disassembly
- Providing a Resource Management Plan, informed by a pre-demolition audit already completed
- Enhancing the building’s flexibility to adapt to future needs, e.g. flexible floorspace layouts, utilising the structure as finish, enable the addition of on-floor plant, provision of access to risers and sufficient space provision in cores, waste stores and cycle stores to enable an increase of occupancy levels
- Considering take-back schemes wherever possible.

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

Energy and C02 emissions

342. The Energy Statement accompanying the planning application demonstrates that the development (option A) has been designed to achieve an overall 44% reduction in regulated carbon emissions compared with a Building Regulations compliant building.

343. The proposed energy demand reduction strategy would reduce the building's operational carbon emissions by 17% compared to a Building Regulations compliant building and includes the following main elements:

- Enhanced thermal envelope performance and air tightness
- Solar shading will be applied to areas at high level, including the 'sky pavilion'
- Solar controlled glazing on all façades
- Thermal mass in the form of exposed concrete slabs
- Optimised glazing areas to allow daylight penetration
- Green roofing and external planting on terraces to mitigate urban heat island effect
- Operable windows for passive ventilation as part of a mixed mode system with mechanical cooling provided by the heat pump system.
- Incorporation of heat recovery from the building services systems, to support space heating

344. There is currently no available district heating network close enough to the site, however, the opportunity to connect to a future district heating network would be incorporated into the proposed development.

345. The proposed low carbon/renewable energy technologies are an air source (and potentially ground source using a thermally activated raft slab – to be investigated) heat pump system based on water cooled chillers and thermal stores for low temperature hot water and chilled water, supported by a water source heat pump for high temperature water, as well as an 30sqm PV panel installation. These technologies would contribute carbon emissions savings of 27% compared to a Building Regulations compliant building. In addition, opportunities to share waste heat with the neighbouring residential developments will be investigated that would provide wider community benefits.

346. The applicants commit to following the transformation to net zero carbon for operational carbon emissions set by LETI (London Energy Transformation Initiative), targeting an ambitious low energy use intensity of 55 kWh/m2/year (GIA) for the completed development. This target does not include renewables and LETI recommends to prioritise

on-site renewables before off-site renewables followed by a minimum 15 year renewable energy power purchase agreement. Achieving the LETI target will be possible for the proposed development if the tenants take responsibility for their part of the building energy demand via green leases and if the detailed design development focusses on optimising the building services strategy.

347. The applicant's consultants have provided table 1.2 that compares the predicted annual operational carbon emissions per square meter of the existing and the proposed building as the grid decarbonises:

1.2 Operational Carbon Comparison

	Existing	Proposed	unit
Basis of Energy (gas, electric,...)	Gas + electric	Electric	
EPC	EPC D (115 Houndsditch) EPC E (117 Houndsditch) DEC E expired (123 Houndsditch)	EPC A (Stage 2 calculations)	
Net Internal Area (NIA)	11,240 combined	42,843	m2
Increase in NIA		381%	
SAP 2012 Grid Carbon Factors			
Operational Carbon emissions per m2	79 (area weighted average of existing buildings BER from EPC)	14.2 (Stage 2 BRUKL)	kgCO2e/m2/yr
% reduction in carbon intensity		-82%	
Total Operational Carbon emissions	887,970	608,370	kgCO2e/yr
% increase/reduction in Total Annual Carbon Emissions		-31.5%	
SAP 10 'current Grid Carbon Factors			
Operational Carbon emissions per m2	41.7*	6.4	kgCO2e/m2/yr
% reduction in carbon intensity		-85%	
Total Operational Carbon emissions	468,708	274,195	kgCO2e/yr
% increase/reduction in Total Annual Carbon Emissions		-41.5%	
Assuming predicted 2035 Grid carbon Factors (Steady Progression Model = electricity 0.095kgCO2/kWh)			
Operational Carbon emissions per m2	23.9*	2.6	kgCO2e/m2/yr
% reduction in carbon intensity		-89%	
Total Operational Carbon emissions	268,636	111,392	kgCO2e/yr
% increase/reduction in Total Annual Carbon Emissions		-58.5%	
Assuming predicted 2035 Grid carbon Factors **			
Operational Carbon emissions per m2	11.6*	0	kgCO2e/m2/yr
% reduction in carbon intensity		-100%	
Total Operational Carbon emissions	130,384	0	kgCO2e/yr
% increase/reduction in Total Annual Carbon Emissions		-100%	

* Based on notional split of energy consumption 30% natural gas and 70% electricity (no details available for existing building consumption beyond EPC)

**Assumes UK grid electricity reach zero carbon from early 2030s.

348. The site-wide energy strategy demonstrates compliance with the London Plan carbon emission reduction targets. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

349. A BREEAM New Construction 2018 pre-assessment has been prepared for the building. The strategy aims to achieve an "Outstanding" rating for the offices on the basis of a "full fit-out". The assumptions made as part of the preliminary pre-assessment indicate that the proposals can meet all the mandatory level requirements for the targeted rating including a score of >85%. The pre-assessment indicates a score of 89.1% and aims 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 and fit-out phase of the development.

350. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. A post construction BREEAM assessment is requested by condition.

Other benchmarking

351. The scheme has also been assessed against the WELL Building Standard version 2 and against the LEED standard (BD+C v4.1). The WELL standard assesses a building's contribution to improved human health and wellbeing, and the proposal would achieve a "Platinum" rating which is the highest score. The LEED standard (shell and core) is a green building project and performance management assessment that focusses on green building design, construction, operations and performance. The proposed development would also achieve a "Platinum" rating here which is the highest score.

Whole Life-Cycle carbon emissions

352. 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.

353. Since the existing building on site has been found unsuitable to be transformed into a high quality, sustainable development over a 60+ year lifetime (see Circular Economy paragraph), the proposed Whole Life-Cycle carbon reduction strategy is based on reducing embodied carbon impacts of the new building elements, in particular focussing on using:

- a steel frame using HISTAR steel with high recycled content
- UK sourced steel reinforcement with 97% recycled content
- concrete elements with 50% GGBS replacement
- Low-carbon calcium sulphate raised access flooring system.

354. The use of virgin materials would be minimised through the reuse of materials from the existing building wherever possible and the widespread use of reused and recycled materials elsewhere throughout the scheme. The building would also be designed for an eventual deconstruction.

1.1 Embodied Carbon benchmark comparison

Scope	Proposed Redevelopment	Benchmark	Benchmark Source
RICS Components	$kgCO_2/m^2$	$kgCO_2/m^2$	
A1-A5		1000	GLA Benchmark
		600	GLA Aspirational
	526	600	LETI 2020 Design
		350	LETI 2030 Design
A-C (excluding B6-B7)		1500	GLA Benchmark
		1400	RIBA Business as Usual
		1180	RIBA 2021 Good
		970	RIBA 2025
		900	GLA Aspirational
	768	750	RIBA 2030
A-C (including B6-B7)	1861		

355. Table 1.1, provided by the applicant's consultants, shows the embodied carbon benchmark compared to various benchmark sources over the proposed development's whole life-cycle at planning stage, demonstrating emissions that improve on the Greater London Authority's aspirational benchmark emissions target. 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

356. 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.

357. The site currently has a low biodiversity value. The new development proposes a variety of opportunities to enhance urban greening and biodiversity at ground level, on terraces and roof level 23. The roof level would provide a sequence of landscaped terraces backed by panel based green walls and climbing planting.

358. The new building would be set back at ground floor level to enable the creation of new public realm areas which would include planters, green walls, integrated seating and ten new trees. Planting would be included at public realm level through large planters and trees and at every level of the building (up to Level 24) on balconies and terraces. On the upper levels (Levels 16 to 23) there are proposed office amenity terraces which would include smaller trees and trailing plants and at the top of the building climbers and green walls (Level 24) would feature. A large office

amenity terrace would be located on Level 23 which would include 'garden rooms' for groups to congregate. The roof terraces are important amenity spaces for the building occupiers and would provide views of the City skyline and beyond.

359. The ecological appraisal recommends the provision of diverse, native wildlife planting. This would include

- Rows of street trees
- A "woodland understorey" of layered planting in containers at public realm level. The planting is chosen to be able to thrive in shade, and would consist of a mix of evergreen and deciduous plants
- 2 x 22m high green walls of climbers on the two exposed party walls in Cutler Street and Houndsditch
- A variety of balconies on each office floor with overflowing planting
- A cascade of office amenity terraces with small trees and trailing plants

360. The terrace planting has been selected to be a mix of shrubs and perennials in combination with climbing plants that are allowed to trail over the balcony fronts and that would suit the different climatic aspects relating to the different elevations of the building. The plant palette would provide seasonal interest and variety but also structure throughout the year, approx. 50% of the plants will be deciduous and 50% evergreen.

361. The biodiverse features would provide a green and attractive setting as there are hard roof surfaces on the existing and surrounding buildings and would result in a net gain in biodiversity value to the site. Any proposed works should take place outside the bird nesting season (March to August) to avoid disruption to wildlife.

362. Details of the quality and maintenance of the proposed urban greening are required by condition.

363. The proposals to incorporate a green wall, street trees and shrubs will result in a potential biodiversity net gain of 0.61 biodiversity units.

364. An Urban Greening Factor (UGF) calculation score has been submitted with the application based on the London Plan scoring table. The red line planning application boundary is based on a site area of 2,884sq.m. The UGF for this application has been calculated as 0.53 based on the information provided, which exceeds both the London Plan and the City's draft Local Plan UGF target of 0.3 for commercial development.

365. The proposal would comply with Local Plan urban greening and biodiversity policies DM10.2, DM10.3 and DM19.2.

Climate Change Resilience

Water resources

366. A low-water irrigation system, water metering and rainwater recycling and harvesting systems are intended to be incorporated to reduce water demand.

367. Further reductions in potable water will be targeted through the specification of highly efficient water saving fixtures, fittings and appliances in order to achieve a 50% improvement over baseline building water consumption.

Flooding

368. The development employs a comprehensive rainwater management strategy, which includes blue/green roofs, rainwater harvesting, and extensive attenuation tanks beneath the building to store peak flows. The basement will be protected by the highest possible grade of waterproofing.

Heat Stress

369. The sustainability statement outlines measures to prevent overheating through the design of the building envelope and the high thermal mass of the building that absorbs heat and provides free cooling via natural ventilation and a supporting air conditioning system. Rejected heat from the air con system would be stored and reused rather than discharged into the atmosphere. The building services system and layout would be adaptable to a changing climate.

Natural Capital and Pest & Diseases

370. The proposed development will incorporate urban greening that would provide a significant increase of quantity and quality of diverse planting in the area, both as public realm enhancement and biodiversity gain overall. This will help to enhance biodiversity providing green routes and small habitats. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient to hotter dryer summers, warmer wetter winter, more extreme weather events and pests and diseases. In addition, the building services system would provide high fresh air rates and filtration measures to eliminate risks of pests and diseases.

371. Overall, this development would include a wide range of measures that demonstrate a clear approach to 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

372. 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.

373. 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 is considered to be an exemplar for demonstrating a holistic approach to creating an inherently sustainable new building as it overall exceeds current and new London Plan policies as well as Local Plan policies, and it is on track to achieve an "outstanding" BREEAM assessment rating as well as highest ratings in the WELL and LEED standards.

374. In particular, the proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced, exceeding industry benchmarks including the GLA's aspirational benchmark. The existing building has been assessed and found to be unsuitable to be transformed into an attractive and sustainable development for a 60year+ period, however, significant operational carbon savings can be achieved over the lifetime of the proposed building. Circular Economy principles have been positively applied to achieve an exemplary, long term, robust, low carbon, flexible and adaptable development. The building design responds well to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

Heat Transfer to the Estate

375. It is proposed to provide thermal stores within the building which would retain waste heat for use later in the year during the cold months. The building is calculated to produce excess waste heat over and above that which can be retained by the thermal stores.

376. Instead of projecting this out to atmosphere it is proposed that this would be exported to the neighbouring Middlesex Street Estate to supply hot water and heating. A $3m^3$ tank can currently be accommodated on the Middlesex Street Estate site, which is capable of providing circa 365MWh of heat energy per year.

377. The applicants have stated that this is a conservative estimate and the actual potential for the system is significantly higher. The Applicant is proposed to future proof the provision to enable an increase in supply in the future subject to the storage space available within the Estate.

378. An objection has been received stating that "There is no absolute commitment to build an effective heat transfer infrastructure, and then the amount of usable heat that will be transferred is questionable since the new building is powered only by electricity, any usable 'waste' heat that may be recaptured would be more effectively used for water heating, etc within the building itself".

379. The shared waste heat from the proposed development could provide significant benefit to residents of Middlesex Street Estate by reducing the

load on the gas boiler plants leading to energy, carbon and financial savings. The on site equipment would be secured by condition. The link to the Estate and the equipment within the Estate would be funded by the applicant, which would be secured through the S106 agreement.

Environmental Impact of Proposals on Surrounding Area

380. 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 DM10.7 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 developments to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Daylight, and Overshadowing

Assessment Context

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

382. Objections to the proposals have been received from residents of the Middlesex Street Estate on the grounds of the development's impact upon the daylight and sunlight to residential properties and its overshadowing of nearby open spaces including within Devonshire Square, the Podium within the Estate, and to shopfronts along Harrow Place. No objections have been received from the owners and tenants of Devonshire Square.

383. Policy DM10.7 of the Local Plan seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the BRE guidelines. Policy DE8 of the emerging City Plan 2036 requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the BRE guidelines.

384. The BRE guidance advises that numerical values are not to be rigidly applied but recognise the specific circumstances of each case. This is acknowledged in the supporting text to policy DM10.7 which states that "The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments. The City Corporation will apply these methods, consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations".

385. The assessment submitted in support of the application has assessed the impact of the proposed development on the daylight and sunlight received by the residential properties at 2 Heneage Lane, Petticoat Tower, Petticoat Square Apartments (also known as Middlesex Street Estate) and 3 and 3A Devonshire Square. Overshadowing assessments have been undertaken in respect of Devonshire Square public realm, Middlesex Street Estate podium level and 2 Heneage Lane/Bevis Marks Synagogue.

386. Paragraph 3.10.41 of the Local Plan and Policy HS3 of Draft City Plan 2036 states when considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals. The cumulative schemes considered under this application include those large-scale major development proposals within 1km of the site which either have full planning permission, resolution to grant consent, applications which are submitted but not yet determined, or potential future applications.

387. None of the cumulative schemes as assessed within the submitted Environmental Statement are professionally considered by the Applicant's Team to be of sufficient massing or in close enough proximity to materially alter the effect of the Proposed Development in terms of the impact upon daylight and sunlight.

388. It is not the case that if the proposed development were granted planning permission a precedent would be set. Any other developments coming forward within the area would still need their own detailed analysis and justification, including cumulative analysis.

Daylight

389. Regarding daylighting, the vertical sky component (VSC) and daylight distribution tests have been applied. The VSC test measures the amount of skylight available at the centre of a window on the external plane of the window wall. The BRE guidelines state that a window which achieves a VSC of 27% or more is considered to provide good levels of light. If with the proposed development in place the figure is both less than 27% and reduced by 20% (0.8 times its former value) or more than the existing level, the loss would be noticeable.

390. As the VSC calculation does not account for the size of the window being tested, the size of the room that it lights or whether there are multiple windows serving a room, the BRE guidelines recommend that the results should be read in conjunction with those of a second test - daylight distribution. The daylight distribution test, also referred to as the No Sky Line test (NSL), calculates the areas of a working plane inside a room (usually 0.85m above the finished floor level) that would or would not have a direct view of the sky. The BRE guidelines state that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% (0.8 times its former value) or more, the loss would be noticeable.

391. A total of 850 windows serving 389 rooms have been assessed in relation to daylight using the VSC and NSL tests.

392. In addition, the Applicants have undertaken and submitted supplementary Radiance Assessments of the daylighting to the affected residential apartments within Petticoat Tower, Middlesex Street Estate and at 3 and 3A Devonshire Square. The radiance diagrams are contained within the plans pack.

393. A Radiance Assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). This method of assessment takes into account the total glazed area to a room, the transmittance quality of the glazing, the total area of the room's internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.

394. Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the BRE guidelines Radiance methodology, the radiance-based assessments can draw upon the BRE's recommended Average Daylight Factor (ADF) target values. Radiance assessment results are presented as colour rendered images to illustrate the individual daylight factors within room. It should be noted that the radiance assessment is not to be relied on solely and should be read in conjunction with the daylight and sunlight assessment submitted in the Environmental Statement in line with BRE Guidelines, which is the methodology established within the development plan/policy framework.

395. The Average Daylight Factor (ADF) assessment is a measure of the overall amount of diffuse daylight within a room that is measured at a working plane 0.85m above a room's finished floor level. The ADF can be calculated a number of ways but the most commonly used methodology is the formula set out in the BRE guidelines. This formula takes account of: the size and shape of a room and its serving window(s); the actual or reasonably assumed reflectance values of a room's internal surfaces (walls, floors and ceiling); the diffuse transmittance of the glazing to the serving window(s); and the amount of visible sky, which is calculated through a Vertical Sky Component assessment.

396. The BRE Guidelines recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens

397. It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels has been generally described in two ways to give a more complete picture. These are:

    - Percentage change (10% reduced to 8% = 20% reduction); and
    - Actual/Absolute change (10% reduced to 8% = 2% change)

3 and 3A Devonshire Square

398. Located to the north of the development site, this property contains three residential dwellings. Two windows are located at the rear of 3 Devonshire Square facing north-east. A total of 21 windows serving 8 rooms have been assessed using the Vertical Sky Component (VSC) methodology.

399. The results show that, of the 21 windows assessed, 16 windows would experience a reduction of 20-29%, and three windows would experience a reduction of approximately 40%. The two rear windows would not experience a reduction in VSC as a result of the proposed development. It is worth noting that the three windows with the highest reduction are located on the flank elevation, and are secondary windows serving the dual aspect living/dining rooms. The main windows of these rooms are located on the front elevation and receive a reduction in VSC of less than 30%. Each window on this elevation retains above 15% VSC at first floor, above 18% at second floor and above 20% VSC at third floor. Mayor of London Supplementary Planning Guidance recognises that VSC values between 13% and 18% have been accepted in many desirable central areas for well over a century.

400. The daylight distribution results using No Sky Line (NSL) calculations show that all rooms would experience small reductions in daylight distribution, with the largest reduction being 7%. This would be a negligible reduction in daylight distribution within the rooms.

401. The Radiance assessment demonstrates that there would be a small reduction in the daylight factor within the rooms. The Living/Dining rooms at first and second floors retain 1.8% and 1.6% ADF; and the Bedrooms 2% and 1.9% ADF. These would be considered appropriate for their intended uses.

402. The first-floor kitchen is reduced from 1.7% to 1.4% ADF and the second floor from 1.6% to 1.3%. While the kitchens would fall below the 2% target, they are small and appear to fall below the size 13sq.m threshold to be qualified as a habitable room for the purposes of the calculations, and are therefore considered to possess a lesser expectation of natural daylight compared to a primary living room.

403. The uses of the third floor rooms are unknown, but have been assessed as separate rooms/flats from the floors below. These rooms would experience an ADF of 0.9% and 0.7%, reductions of 0.3% and 0.2% ADF respectively. The existing rooms already receive lower light levels by virtue of them having smaller, dormer windows compared to the larger windows on first and second floors.

404. Based on consideration of VSC and NSL together, while there are some minor losses of skylight (VSC) to the main windows the daylight distribution (NSL) of the rooms is unnoticeably affected by the proposed development. The Radiance assessment demonstrates that there would be a small reduction in the daylight factor within the rooms, with the living / dining and bedrooms at first and second floors retaining an Average Daylight Factor appropriate to their uses.

405. The results of all the tests show that the reductions in daylight to the residential units at 3 and 3A Devonshire Square would be small and the retained values would be good for a central London location. The overall impact to these units is considered to be minor adverse taking into account the combined results of the various assessments on daylight.

2 Heneage Lane

406. This property is a residential dwelling located to the south of the site. A total of 7 windows serving 5 site facing rooms have been assessed for daylight.

407. The VSC assessment demonstrates that none of the windows would experience any reduction as a result of the proposed development.

408. The daylight distribution (No Sky Line) test shows that none of the assessed rooms would receive any reduction in daylight distribution as a result of the proposed development.

Petticoat Tower

409. Petticoat Tower is a 23 storey residential tower forming part of the Middlesex Street Estate located to the east of the site. It consists of 88 residential flats located over 22 floors. A total of 128 windows serving 86 rooms have been assessed for daylight.

410. The results show that, of the 128 windows assessed for VSC, 18 windows would experience no reduction in VSC as a result of the proposed development. The remaining 110 windows would experience reductions in VSC of less than 20% over the existing situation, with 56 of them retaining VSC of over 27%. This is considered to be a negligible reduction in light to the windows.

411. The NSL calculations show that 62 of the 86 rooms assessed would experience no reductions in daylight distribution. 21 Rooms would experience reductions of less than 20% daylight distribution meeting BRE guidelines. One room would receive a reduction marginally over 20% and two rooms would receive reductions in daylight distribution of 38% and 40%. It should be noted that these three rooms are bedrooms, which the BRE acknowledge have a lower expectation of light than primary habitable spaces (such as living rooms).

412. The Radiance assessment demonstrates that there would be a very small reduction in the daylight factor within most of the assessed rooms. 10 Rooms would experience no change in their average daylight factor following the development. 74 rooms would experience a reduction of 0.1% in ADF, which is a marginal loss as demonstrated by the Radiance drawings. Two rooms would experience a reduction of 0.2% ADF. These rooms are used as living / dining rooms and would have a resulting ADF of 1.9% and 2%, surpassing BRE’s recommended 1.5% ADF for rooms of this use.

413. The overall impact to the majority of residential units within Petticoat Tower is considered to be negligible, with a minor adverse impact to the remaining impacted flats, taking into account the combined results of the various assessments on daylight.

Petticoat Square Apartments

414. The main bulk of Middlesex Street Estate comprises blocks of apartments surrounding Petticoat Square and Petticoat Tower, bounded by Harrow Place, White Kennet Street, Gravel Lane and Middlesex Street. It is located to the east of the site and comprises seven storey blocks with retail at ground floor and a total of 146 residential apartments above. A total of 695 windows serving 290 rooms have been assessed for daylight.

415. The assessment demonstrates that 676 of the windows assessed would experience a reduction in VSC of less than 20%, thereby experiencing a negligible reduction in skylight to the window. Nine windows would experience a reduction of between 20-29% VSC and five windows a reduction of between 30-39%. One window would experience a 57% reduction in VSC, and four windows would experience a reduction of 100%.

416. Where there is a reduction of greater than 20% in VSC to the existing windows, they already receive very low levels of light. The absolute VSC reductions are recorded as being between 0.2% - 1.5%, with the 4 windows experiencing a 100% reduction having an actual loss of 0.1 - 0.3%. These would be fractional and imperceptible reductions which translate into a higher percentage change due to very low existing values.

417. The NSL calculations show that 282 of the 86 rooms assessed would experience reductions in daylight distribution of less than 20% resulting in a negligible impact according to the BRE guidelines. Six rooms would experience reductions of between 20-29% and two rooms would receive reductions of 34% and 37%, which is considered to be a minor adverse effect.

418. The Radiance assessment demonstrates that there would be a very small reduction in the daylight factor within some of the assessed rooms. 225 Rooms would experience no change in their average daylight factor following the development. 65 rooms would experience a reduction of 0.1% in ADF, which is a marginal loss, as demonstrated by the Radiance drawings.

419. The daylight distribution and radiance assessments demonstrate that, while there would be a reduction in the amount of light received by a number of windows, those with the highest reductions would experience less than 20% reduction in NSL and no reduction in ADF, resulting in a limited reduction in light experienced within the room.

420. The overall impact to the majority of residential units within Petticoat Square apartments is considered to be negligible, with a minor adverse impact to the remaining impacted flats, taking into account the combined results of the various assessments on daylight.

Daylight Conclusion

421. Overall the assessments submitted in support of the application demonstrate that there would be some loss of amenity in a small number

of rooms within 3 and 3A Devonshire Square, Petticoat Tower and the Petticoat Square Apartments as a result of the proposed development, with the majority of assessed rooms within the Middlesex Street Estate experiencing a negligible impact as a result of the proposed development. No adverse effects are predicted for the residential unit at 2 Heneage Lane.

422. Taking into account the BRE Guidance, it is considered that the proposed development would not reduce noticeably the daylight available to nearby dwellings to unacceptable levels, and would accord with Local Plan policy DM10.7.

Sunlight

423. Regarding sunlight, the BRE guidance recommends that all main living rooms of dwellings should be checked if they have a window facing within 90 degrees of due south. The available sunlight is measured in terms of the percentage of annual probable sunlight hours (APSH) at the centre point of the window. Probable sunlight hours is defined as "the long-term average of the total number of hours during a year in which direct sunlight reaches the unobstructed ground (when clouds are taken into account)". Sunlighting of a dwelling may be adversely affected if the centre of the window:

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

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

425. The properties at 2 Heneage Lane are located to the south of the proposed development and therefore a sunlight analysis is not required, in accordance with the BRE guidelines.

<u>3 and 3A Devonshire Square</u>

426. All of the eight rooms assessed for daylight have at least one site facing window which is orientated within 90 degrees of due south. The assessment demonstrates that two of the rooms assessed would meet the BRE guidelines criteria, and therefore are considered to experience a negligible impact.

427. Six rooms would receive a reduction of greater than 40% reduction for Winter APSH, with one of those experiencing a reduction of between 20-29% total APSH, two a reduction of between 30-39% APSH and three a reduction of over 40% APSH.

428. Despite these reductions, all main living rooms assessed would retain well in excess of 25% total APSH, which meets BRE Guidance

recommendations for a suburban environment. The overall impact is considered to be minor adverse.

Petticoat Tower

429. Of the 86 rooms assessed for daylight, 64 rooms have at least one site facing window which is oriented within 90 degrees of due south. The assessment demonstrates that 61 of the rooms would meet the BRE guidelines criteria, and therefore are considered to experience a negligible impact. Three rooms would experience a reduction in total APSH of between 20-29% APSH.

Petticoat Square Apartments

430. Of the 290 rooms assessed for daylight, 175 rooms have at least one site facing window which is oriented within 90 degrees of due south. The assessment demonstrates that all of these rooms would meet the BRE guidelines criteria, and therefore are considered to experience a negligible impact

Sunlight Conclusion

431. Overall there would be a negligible impact in the sunlight to residential windows within the Petticoat Square Apartments and to the majority of windows within Petticoat Tower. Three rooms within Petticoat Tower and six rooms within 3 and 3A Devonshire Square would experience a noticeable reduction in sunlight as a result of the proposed development.

432. This is considered to be a minor adverse impact. The majority of the affected rooms within 3 and 3A would still retain well in excess of 25% total APSH following the proposed development, which accords with the BRE guidelines.

433. Taking into account the BRE Guidance, it is considered that the proposed development would not reduce noticeably the sunlight available to nearby dwellings to unacceptable levels, and would accord with Local Plan policy DM10.7.

Overshadowing

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

Devonshire Square

435. The development is situated to the south of Devonshire Square, which contains commercial and residential properties. There is a landscaped area and pedestrian route on the southwestern side of Devonshire Square, adjacent to Cutler Street, which includes seating.

436. In the existing scenario, this landscaped area only receives sunlight between 8am and 10:30am on 21st March and only 22% of the area receives two hours of sunlight, which means that this area already does not comply with BRE guidance. This is due to overshadowing caused by the existing buildings on the site, and other buildings in the locality.

437. The southwestern boundary of the space (adjacent to the road) is planted with a continuous belt of trees, which form a hedge. The impact of these trees have not been included in the applicant's assessment but it is likely that they would cast shadow over the space, particularly because the time the sun would reach it is when the sun is travelling at a lower trajectory.

438. Whilst the proportional loss in sunlight to this space would be very high (82%) and it technically considered to be a major adverse impact, the real impact is likely to be modest in nature and reduce the amount of sunlight to this space by approximately one hour. It is considered that the proposed development would not materially affect the use of this space.

439. On 21st June, 82% of the area would receive more than two hours of direct sunlight a day in both the existing baseline and with the proposed development.

Middlesex Street Estate

440. The development is situated to the southwest of the Middlesex Street Estate. The podium in the centre of the Estate is amenity space for residents of the Estate.

441. The submitted assessment explains that 74% of this area receives two hours of direct sunlight on 21st March. Following the proposed development there would be no reduction to the areas receiving more than two hours of sunlight and the space will be adequately sunlight throughout the year. The effect on this amenity area is considered to be negligible.

442. The application has assessed the impact on the commercial units on Harrow Place, several of which have outdoor seating areas. The assessment concludes that the impact of the proposed development on these units would be negligible and would accord with BRE guidance.

Impact upon efficiency of future PV panels on the Estate

443. Finally, it is understood that, as part of a community energy project, there is a plan to install photovoltaic panels on the roof of the Middlesex Street Estate blocks. As set out above, Point 2 (the Applicant's consultants) have analysed the overshadowing impact of the proposed development on the Podium amenity area and the balconies which have a view towards the application site. It has been concluded that the Proposed Development will have a negligible impact on the direct sunlight to the Middlesex Street Estate. Given the suggested location of the PV panels is more exposed to direct sunlight compared to the podium level, Point 2 have concluded that the Proposed Development

will also have a negligible effect to the roof of the MSE. This conclusion is accepted by Officers.

444. It is also worth noting that solar panels tend to rely on solar energy (or 'irradiation') rather than direct sunlight. Whilst there may be certain times of day on certain days of the year when the amount of time the sun directly hits the roof will be slightly less compared to the existing setting, the Proposed Development should not harm the overall efficacy of the proposed solar panels.

Overshadowing Conclusion

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

Solar Glare and Light Pollution

Solar Glare

446. Local Plan policy DM10.1 requires all developments to avoid intrusive solar glare impacts on the surrounding townscape and public realm. Draft City Plan policy DE8 requires developments to incorporate design measures to mitigate adverse solar glare effects on surrounding buildings and townscape.

447. Four viewpoints have been identified and assessed for solar glare impact: travelling southeast on Houndsditch, travelling northeast on the cycle path on Goring Street and travelling south/southwest on Harrow Place from two locations.

448. The assessment results demonstrate that in all of these scenarios the solar reflectance would fall within an approaching driver's far peripheral vision and not obscure any apparent traffic signals or pedestrian crossings.

449. The effect on road users is therefore considered to be no greater than minor adverse and not significant.

450. The development would be in accordance with Local Plan policy DM10.1 and City Plan 2036 policy DE8.

Light Pollution

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

452. The Proposed Development would include lighting to improve the legibility of the public realm. The applicant has explained that control systems would ensure that lighting levels are appropriate for different times of the day, and energy consumption and light intrusion is reduced.

453. The interior lighting of the lobby and podium levels would be highly visible through the glazed façade. The application has explained that lighting controls would also be used to adjust the lighting to appropriate

levels for the time of evening or night, so that it appears balanced with the surrounding public realm.

454. Lighting to the planting on the balconies and terraces would be switched off at night to minimise unnecessary energy use and limit the impact on the surrounding area. Lighting would be directed towards plants to minimise direct light spill into the sky.

455. The internal lighting of the office will be designed to reduce energy consumption, avoid spillage of light beyond where is it needed and protect the amenity of nearby residents. This will be achieved by designing the first 1.5m depth behind the façade glazing to be free from lighting where practical and where present it will use luminaires with low brightness and low glare. All luminaires will be dimmable and switched off when a room is unoccupied.

456. An objection has been received raising concern about internal lights being left on when the building is not occupied. A condition is recommended requiring a lighting strategy, which would include internal lighting levels and how this has been designed together with management measures to reduce glare and light trespass.

457. Subject to the recommended condition, the proposed development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9.

Overbearing / Dominance

458. Objections have been received stating that the proposed building would be overbearing and have an impact on their outlook.

459. The proposed development would be located 32m from the closest point on the Middlesex Street Estate and 27m from 3 and 3A Devonshire Square and would not be in the direct view from inside of the flats as it is located at an oblique angle from the residential blocks and tower.

460. It is therefore considered that it would not have a significant impact.

Overlooking

461. The shaping and design of the terraces have been designed to avoid any impact on overlooking of neighbouring residential properties, specifically Petticoat Tower, Petticoat Apartments and 3/3A Devonshire Square.

462. Due to the distance, angle and relative heights of the terraces it is considered that none of the residential properties would be directly overlooked. The applicant has considered planter and balustrade locations to avoid any direct views, and the balconies have been angled to avoid any instances of overlooking.

463. Similarly, due to the separation distance and angle of the buildings there would be no direct overlooking of residential properties from within the proposed office floors. The façade mullions/transoms and facade planting provide a further physical barrier which would prevent overlooking.

Wind Microclimate

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

465. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, being 5 Comfort Categories defining conditions suitable for frequent sitting / occasional sitting / standing / walking / Uncomfortable.

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

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

468. Assessments have been carried out for both the Windiest Season and the Summer Season.

469. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance this would only be by one category. 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.

470. The following configurations have been assessed:

- Existing site with existing surrounding buildings (Baseline Conditions)
- Proposed development with existing surrounding buildings
- Proposed development with existing surrounding buildings and existing landscaping
- Existing site with consented cumulative schemes
- Proposed scheme with consented cumulative schemes

Existing Baseline Conditions

471. The baseline scenario indicates that the Site and nearby surrounding area has conditions ranging from suitable for frequent sitting to standing use during the windiest season. In some areas during the summer

season, wind conditions are one category calmer, but still range from suitable for frequent sitting to standing use.

472. No strong winds exceeding the safety threshold would occur.

473. All roads and thoroughfare locations within and around the Site have wind conditions suitable for frequent sitting to standing use during the windiest season.

474. The existing entrances around the Site have wind conditions suitable for frequent sitting to standing use during the windiest season. The existing on-site entrances have wind conditions suitable for occasional sitting during the windiest season. These wind conditions are suitable for entrance use.

475. Pedestrian crossings around the Site have wind conditions ranging from suitable for occasional sitting to standing use during the windiest season.

476. The bus stop on Houndsditch has wind conditions suitable for occasional sitting during the windiest season.

477. Ground level amenity spaces around the Site have wind conditions suitable for frequent sitting and occasional sitting during the summer season. Areas with occasional sitting conditions are windier than suitable as there are seating provisions allocated in these areas.

478. Podium amenity spaces on Middlesex Street Estate have wind conditions suitable for frequent sitting and occasional sitting during the summer season. These wind conditions are suitable for a large public and private terrace space.

Proposed Development with Existing Surrounding Buildings

479. In the presence of the Proposed Development, conditions would increase in windiness compared to the existing scenario in some locations. Conditions would still range from suitable for frequent sitting to standing use

<u>Roads and Thoroughfares</u>

480. In the presence of the proposed development, all roads and thoroughfares would experience wind conditions which are suitable for the intended use (standing conditions or calmer). This would be considered to be a negligible impact.

481. Windier conditions compared to the existing would occur at three road locations (which would be suitable for standing use). These conditions would remain suitable for the intended use.

482. A few off-site thoroughfares would have conditions up to two categories windier compared to the baseline scenario, suitable for occasional sitting and standing use during the windiest season. On-site thoroughfares would have wind conditions suitable for frequent sitting to standing use during the windiest season. These wind conditions would remain suitable for the intended use.

Entrances

483. Entrances to the Proposed Development would have wind conditions mainly suitable for frequent sitting and occasional sitting, with two instances of standing use during the windiest season. These are appropriate for their intended use.

484. All entrances to the surrounding buildings would have wind conditions suitable for standing use or calmer during the windiest season.

485. Wind conditions at some surrounding entrances (measurement locations 80, 95, 110, 148, 161, 163) would become windier than in the baseline scenario, suitable for occasional sitting use at worst. These conditions would remain suitable for the intended use; therefore, no mitigation would be required.

Pedestrian Crossings

486. Wind conditions at the off-site pedestrian crossings would be suitable for occasional sitting during the windiest season. Wind conditions at measurement location 55 would be one category calmer than in baseline scenario. This would represent a Negligible effect.

Bus Stop

487. The bus stop on Houndsditch Road would have wind conditions suitable for occasional sitting during the windiest season, as per the baseline scenario.

Amenity Spaces – Ground Level

On-Site

488. On-site ground level amenity spaces would have wind conditions suitable for frequent sitting to standing use during the summer season. Frequent sitting in two locations (measurement locations 125 and 136) would be one category calmer than required for the intended use.

489. Standing conditions at measurement location 43 and occasional sitting conditions at measurement location 121 would be one category windier than suitable for the intended use during the summer season. This would represent a Moderate Adverse effect and would require mitigation (discussed below).

Off-Site

490. Off-site amenity spaces would have wind conditions ranging from suitable for frequent sitting use to occasional sitting use during the summer season.

491. Windier conditions compared to the baseline scenario suitable for occasional sitting use would occur at measurement locations 82 and 89 (Devonshire Square), 151 and 159 (Harrow Place), and the corner of Stoney Lane in the summer season.

492. With the inclusion of the existing landscaping into the wind tunnel test, the conditions at measurement locations 82, 89, 151 and 159 would be suitable for frequent sitting, as in the Baseline scenario.

493. Windier conditions in comparison to the baseline scenario would still occur at the spill out seating represented by measurement location 181 (corner of Stoney Lane), which has frequent sitting conditions in the baseline scenario, and would have occasional sitting conditions with the inclusion of the Proposed Development and existing landscaping. Spill out seating adjacent to measurement location 181, represented by measurement location 182 would have suitable conditions in comparison to the baseline scenario with frequent sitting use during the summer season, one category calmer than in the baseline scenario. As the suitability of the entire seating area remains consistent with the baseline scenario this would represent a Negligible effect and no wind mitigation measures are proposed.

Amenity Spaces – Podium

494. Similar to the Baseline Scenario, podium amenity spaces on Middlesex Street Estate would have wind conditions suitable for frequent sitting and occasional sitting during the summer season. This would represent a Negligible effect.

Amenity Spaces – Upper On-Site Levels

495. Roof terrace amenity spaces on the Proposed Development would have wind conditions suitable for frequent, occasional sitting and standing use (measurement locations 197 and 198) during the summer season. This would be acceptable provided seating provisions (such as benches or planter seating) will be included in areas suitable for occasional use or calmer use during the summer season. If seating is to be allocated in areas suitable for standing use this would require mitigation measures to be implemented.

496. Private balcony amenity spaces of the Proposed Development would have wind conditions suitable for frequent sitting and occasional sitting during the summer season. This is acceptable for private amenity use.

Strong Winds

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

Mitigation

498. The inclusion of the existing landscaping provides mitigation to several ground level amenity locations, off-site at measurement locations 82, 89, 151 and 159.

499. The following areas of the Proposed Development would require wind mitigation measures to improve wind conditions such that the location would be suitable for the intended pedestrian use:

- Proposed on-site occasional outdoor seating space with conditions suitable for standing use during the summer season (measurement location 43);
- Proposed on-site café seating area with occasional sitting use (measurement location 121); and

- Roof terrace areas with standing conditions (measurement locations 197 and 198) if seating provisions are allocated in this area.

500. The addition of 1.5m tall hedges or at least 50% close porous screens on adjacent sides of the seating area would be expected to provide beneficial shelter to these seating areas. Alternatively, moving these seating provisions to areas suitable for frequent sitting use along the eastern side of Cutler Street (West) (measurement locations 125, 128 and 130) would also mitigate these areas.

501. The proposed landscaping scheme for the terraces would be expected to provide beneficial shelter. The proposed trees will be a minimum of 3-4m in height. However, if seating is allocated in areas suitable for standing use during the summer season providing localised shelter to the seating areas in the form of dense planting or hedging at least 1.5m in height or hard screening at least 1.5m in height and no more than 50% open porosity would provide beneficial shelter. With the inclusion of these measures the roof terrace seating provisions would be expected to have wind conditions suitable for occasional sitting use during the summer season.

502. With the inclusion of these measures ground level amenity spaces at the Proposed Development would be expected to have wind conditions suitable for the intended use during the summer season.

Cumulative Impacts

503. The potential wind microclimate impacts have also been assessed incorporating cumulative approved surrounding developments located within a 450m radius of the site.

504. With the inclusion of the cumulative schemes, some locations have become windier, generally changing by one comfort category. The categories throughout the site and surroundings would remain between frequent sitting and standing use, with all locations being appropriate for their intended use, except those identified in the Proposed Development with Existing Surrounding Buildings above.

Wind Microclimate Conclusion

505. In conclusion, where wind conditions become windier at ground level and upper level terraces, they remain suitable for the intended uses in the proposed scenario and so no additional mitigation above that proposed is required. The details of the proposed mitigation measures identified above will be secured by condition and will be required to be maintained throughout the life of the building.

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

material adverse impacts are realised, mitigation measure would need to be explored and implemented.

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

Thermal Comfort Assessment

508. London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Draft City Plan Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Draft City Plan Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

509. In accordance with the City of London Thermal Comfort Guidelines a 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.

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

Usage Category	% of hours with Acceptable UTCI	Description
All Season	≥90% in each season	Appropriate for use all year round (e.g. parks)
Seasonal	≥90% spring-autumn AND	Appropriate for use during most of the year (e.g. outdoor dining).

	≥70% winter	
Short Term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round
Short Term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
Transient	≤25% in winter OR ≤50% in any other season.	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

511. All areas have been assessed for all hours in a year between 8:00 am and 8:00 pm (GMT), as specified by the City of London Thermal Comfort Guidelines. This analysis was conducted for three configurations: Existing Site with Existing Surrounding Buildings, and Proposed Development with Existing Surrounding Buildings, and Proposed Development with Consented Cumulative Surrounding Buildings.

Existing Baseline Conditions

Ground Level

512. The vast majority of the current pedestrian realm in the area surrounding the Site has seasonal or all-season thermal comfort conditions, with short term and short term seasonal thermal comfort conditions around 100 Bishopsgate due to the increased windiness associated with these tall buildings.

513. The majority of the areas in the pedestrian realm around the existing Site have suitable thermal comfort conditions for their intended uses. The exception is at the seating area north of 110 Bishopsgate, where short term thermal comfort conditions were predicted. It should be noted that trees present in this area were not included in the modelling, which are likely to improve conditions in comparison to what has been predicted.

Off-site Podium and Terrace Level

514. All of the existing off-site podium and roof level terraces have short-term thermal comfort conditions or better with some areas (110 Bishopsgate, 6-8 Bishopsgate, The Willis Building and 120 Fenchurch Street) experiencing short-term seasonal thermal comfort conditions in small areas. As none of the existing off-site podium or roof level terraces have sensitive receptors that would require long term comfort, these thermal comfort conditions are considered suitable for their current usage.

Proposed Building with Existing Surrounding Buildings

Ground Level

515. At ground level, thermal comfort conditions with the Proposed Development in situ would generally remain similar to the baseline conditions. There would be areas changing between all season and seasonal thermal comfort conditions, such as along Devonshire Square, White Kennett Street, and Harrow Place. Conditions around the northern corner of 100 Bishopsgate were predicted to improve somewhat. The size of the zone with short-term seasonal thermal comfort conditions shrinks compared to the existing condition.

516. Along the southern façade of the Proposed Development, an area of short-term thermal comfort conditions is predicted; however, this area would be highway, and thoroughfare adjoining the entrance of the building with no fixed seating proposed to be situated in this space, conditions are suitable for the intended use.

On-Site Terrace Levels

517. The terraces on the Proposed Development would largely have all season thermal comfort conditions. Smaller areas of seasonal thermal comfort conditions on the majority of levels also exist as do isolated areas of short-term thermal comfort conditions on the 23rd level. Overall, it is considered that the conditions on the terraces would be suitable for the intended use.

Off-Site Podium and Terrace Level

518. The introduction of the Proposed Development would not have any material impact on the thermal comfort conditions of the existing podium and roof level amenity spaces in the local area. As such the thermal comfort conditions of the surrounding podium and roof terrace levels would be the same as those presented in the baseline scenario (Configuration 1), which were suitable for the intended use.

Proposed Building with Consented Cumulative Surrounding Buildings

Ground Level

519. With the introduction of nearby consented cumulative schemes, thermal comfort conditions remain generally similar to the proposed building with existing surrounding buildings scenario (Configuration 2), although worth noting that the area with short term thermal comfort conditions along the southern facade of the Proposed Development shrinks with the consented surrounding schemes in place. The northern corner of 100 Bishopsgate would have isolated areas of short term seasonal thermal comfort conditions, similar to the baseline scenario. Areas of short-term thermal comfort conditions are now predicted around 30 St Mary Axe and the consented 1 Undershaft scheme. However, conditions would still be suitable for their intended uses. This is also true of the thermal comfort within the proposed new public realm.

On-Site Terrace Levels

520. Thermal comfort conditions at the on-site terrace level areas would be same as in the proposed building with existing surrounding buildings scenario (Configuration 2), as such all on-site terrace level areas would be suitable for the intended use.

Off-Site Podium and Terrace Level

521. The introduction of the Cumulative schemes does not alter the thermal comfort conditions of the existing surrounding podium and roof level terraces to a level that would be incompatible with their uses. All terraces expected to have short-term thermal comfort conditions or better and only small areas of short-term seasonal conditions. As such all existing off-site podium and roof level terraces would have suitable thermal comfort conditions for the intended use under this configuration.

522. The podium level of 50 Fenchurch Street would have isolated areas of short term seasonal thermal comfort conditions; however, landscaping was not included in the modelling, which may improve conditions in comparison to what has been predicted. Other podium and roof level terraces introduced with the consented cumulative schemes would all have short-term, seasonal, or all-season thermal comfort conditions, suitable conditions for their intended use.

Thermal Comfort Conclusion

523. The introduction of the proposed development would not be predicted to change the thermal comfort conditions at ground level or surrounding podium or terraces to the point that they would be incompatible with the current or proposed use types. The terrace levels of the Proposed Development would have predominantly ‘all season’ and ‘seasonal’ thermal comfort conditions, acceptable for their intended use.

Noise and Vibration

524. Local Plan policy DM15.7 and London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment.

525. 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, and demolition and construction; noise from the proposed development during operation; and noise associated with increases in traffic, which could be attributed to the development.

526. Generally, in City redevelopment schemes, most noise and vibration issues occur during demolition and the early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Demolition Management Plan and Construction Management Plan to be approved by condition.

527. The proposed development included mechanical plant which would be located at both roof and basement levels. To ensure that noise from

plant is adequately controlled and minimised, conditions are recommended relating to plant noise and vibration.

528. All deliveries (including deliveries to the retail units and community centre) would take place within dedicated loading bays at basement level and would therefore have a negligible impact in terms of noise associated with unloading.

529. In order to minimise any disturbance from the retail units and community centre and terraces conditions are recommended restricting opening hours and the playing of music.

Air Quality

530. 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 SI1 of the London Plan.

531. The emissions associated with vehicle trips have been assessed and should have negligible impact on the local air quality. The development would meet both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

Health Impact Assessment

532. The applicants have submitted a Health Impact Assessment (HIA) which has been based on the Healthy Urban Development Unit criteria, with adaptions to take into account the particular circumstances of the City. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:

- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment;
- Introduction of a new exemplary low carbon office building of the highest design quality, representing an appropriate response to the character of the area and enhancing this important gateway between the established Eastern Cluster and adjacent Middlesex Street Estate.
- Enabling the provision of a new on and off site ‘energy exchange’ infrastructure to facilitate heating and hot water supply to the Middlesex Street Estate, delivering the opportunity, with CoL agreement, for significant energy and carbon savings for the local community, and future proofing to increase this benefit further.
- Provision of a dedicated two-level community space within the building, off Cutler Street (North), with generous ground floor frontage and fully accessed at street level, creating a space for curated programmes focussed on gardening and green initiatives

and celebrating community projects designed for local groups, including schools and charities, to use for free. This space may incorporate a ‘green café’ and ‘gardener’s store’ uses adding to the activation of the proposed public realm.

- Delivering an exemplary ‘greened’ building replacing an existing brownfield site and securing an Urban Greening Factor of 0.53, exceeding policy requirements, in addition to a significant biodiversity net gain score of 0.58 credits, compared to the existing situation of 0.00 credits. This is one of, if not the highest scores of any major scheme delivered in the City of London.
- Inclusivity and accessibility as placemaking priority areas; A car free building minimising vehicle travelling to the site along with cycle parking to support active travel
- Building and landscape design considering sustainability and climate change with Air Source Heat Pumps (ASHP)
- Building and landscape design also providing an enhanced environment for workers and site users as well as the wider public through an attractive public realm, greening measures and active travel measures; and
- Provision of community floorspace and affordable workspace providing significant public benefits to the local community.
- LEED Platinum and WELL Platinum rating is targeted.
- Although there is no gym / exercise space, a great emphasis has been put on the front-of-house cycle access and facilities, encouraging physical exercise on the way to and from work. Given that the users are also increasingly walking or running to work, the extensive changing and shower facilities are available for everyone to use.
- Green amenities are allocated on every floor, providing relaxing spaces for a break and direct access to fresh air, with spacious biodiverse terraces accessible on upper levels.

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

- Implementation of a travel plan to maximise uptake of active travel options;
- Implementation of a Delivery and Service Plan (DSP) to ensure sustainable modes and operation of freight;
- Implementation of a Construction Environmental Management Plan (CEMP) including dust, noise and vibration and hours of construction works;
- Implementation of a Construction Logistics Plan (CLP) to minimise the environmental and road traffic related impacts of the demolition and construction;

- Secure local employment and training initiatives via planning obligations
- An Air Quality and Management Plan to minimise the impact of dust at the construction phase; and
- The requirement for an Operational Management Plan to minimise noise at the operational and commercial uses.

534. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations.

Fire Safety

535. 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.

536. The application is accompanied by a fire safety statement which demonstrates how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of warning and escape, fire safety features and means of access for fire service personnel.

537. The statement has been assessed by District Surveyors, who noted that, in respect of mobility impaired evacuation, a great emphasis has been placed upon the need to manage this with appropriate procedures to ensure the firefighting lifts can be used before needed by the London Fire Brigade, and requested the inclusion of a condition to require a suitable management plan.

538. 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.

539. Subject to compliance with the condition the proposed development would meet the requirements of Policy D12 of the London Plan.

Equality Impact

540. 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.

541. 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

542. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

543. 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.

544. This application has been assessed against the Equality Act 2010 and any equality impacts identified.

545. 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:

- Bevis Marks Synagogue
- Middlesex Street Estate Leaseholder Association
- Local Residents
- Worshipful Company of gardeners
- Mansel Street Estate Gardening Club
- Artizan Street Library and Community Centre
- St Botolph Church
- Church of St Katherine Cree
- Aldgate School
- Canon Barnet Primary School
- St Marylebone School

546. As set out in the submitted Statement of Community Involvement (SCI), the consultation process included an engagement strategy with statutory and non- statutory community and political stakeholders, residents and neighbours in the City of London, in particular with the Middlesex Street Estate as an important immediate residential neighbour. The Applicant wrote to all neighbours, both residential and commercial, surrounding the site to invite them to take part in the consultation. This sought to understand the needs of local community groups and identify opportunities for partnership and facilitation particularly in relation to part of the public benefits of the project – notable the community space and how that space can best serve the identified stakeholder.

547. As set out earlier in the report, it is intended that the community space is a free to use dedicated community space specifically designed for the diverse local community, charity, religious, cultural/art and education groups and organisations to hold events, gatherings and exhibitions for the public to take part in.

548. Potential equality impacts to occur during the construction and operation phase of the project are users of community facilities, place of worship, residents workers and visitors to the City by changes in transport and access, neighbourhood amenity relating to air quality, noise and green infrastructure and employment and skills sector due to the creation of new economic opportunities.

549. Negative impacts on the amenity of local residents, workers, and visitors may potentially occur during the construction phase of the Proposed Development due to changes in air quality, daylight/sunlight, heightened levels of noise and vibration, and construction traffic.

550. Potential impacts of the proposed development on the nearby occupiers, have been assessed, including the impacts on the use and functionality of the spaces, including on the Bevis Marks Synagogue. Officers do not consider that they would be detrimentally impacted in so far as these spaces become unusable nor would it be considered that there would be disadvantages or material impact on any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.

551. The closure of the pedestrian route along Cutler Street during the construction phase may impact pedestrian accessibility to the nearby Artizan Street Library and Community Centre, but it is not thought that this impact will be noticeable by users in the context of the existing pedestrian environment and transport access to the centre.

552. The placement of trees in the middle of the footway may have adverse impacts for partially sighted and blind people. These impacts would be mitigated through the implementation of appropriate materials to provide tactile information and tonal contrast to alert partially sighted and blind people of the presence of the trees. This would be dealt with as part of the detailed design of the S278 works.

553. In addition the proposed development has been assessed against policy GG1 of the London Plan and would be considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

554. Overall, the amenity impacts of construction and operation of the Proposed Development are expected to be minimal for impacts related to air quality, daylight and sunlight, and visual amenity. The noise impacts of the Proposed Development are expected to result in adverse amenity impacts, particularly during demolition and substructure works. These impacts will be monitored as outlined within the CEMP, but will result in an adverse equality for the duration of the demolition and substructure works. Overall, young people (incl. children), older people, pregnant women, and disabled individuals are expected to experience negative equality effects on amenity during the demolition and

construction phase and negligible equality effects during the operational phase.

Human Rights Act 1998

555. 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").

556. Insofar that 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.

557. As set out above, it is the view of officers that there would be no infringement of Article 9 of the ECHR, and in particular there would no infringement of the freedom to manifest religion or belief in worship, teaching, practice and observance.

CIL and Planning Obligations

558. 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.

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

560. 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 contributions towards Crossrail. 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).

561. 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	£9,009,958	£8,649,559	£360,398

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	£4,001,325	£3,801,259	£200,066
City Planning Obligations			
Affordable Housing	£2,627,050	£2,600,780	£26,270
Local, Training, Skills and Job Brokerage	£1,576,230	£1,560,468	£15,762
Carbon Reduction Shortfall (*as designed*) ***Not indexed***	£1,055,925	£1,055,925	£0
Section 278 (Evaluation and Design) ***Not indexed***	£100,000	£100,000	£0
Security Measures (Eastern City Cluster) ***Not indexed***	£525,410	£520,156	£5,254
S106 Monitoring Charge	£5,250	£0	£5,250
Total liability in accordance with the City of London's policies	**£9,891,190**	**£9,638,587**	**£252,603**

City's Planning Obligations

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

- Highway Reparation and other Highways Obligations

- *(incl. Highways Schedule of Condition Survey, site access, obtaining consents, licences etc)*
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (*Demolition & Construction*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Travel Plan (including Cycling Promotion Plan)
- Legible London Contribution (£32,000)
- Construction Monitoring Costs
- Carbon Offsetting
- Be Seen - Whole Life Carbon Monitoring
- Utility Connections
- Section 278 Agreement (*CoL*)
- Trees within Public Realm /Highway
- Public Space provision
- Cultural Implementation Strategy
- Public Art
- Community Space and Cafe provision
- Pop up retail kiosks
- Incubator space for SME's Levels 1 & 2
- Retail incubator space for SME
- Waste Heat Transfer to Middlesex Street Estate
- Lower Ground Level Storage Area for Traders of Petticoat lane Market and Pop Up Stalls and Kiosk's on Cutler street West
- Operational Management Plan

563. 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. 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 scope of the S278 agreement will cover Houndsditch, Cutler Street West, Cutler Street North, Devonshire Square and White Kennet Street as follows;

    - Footway repaving on Houndsditch, Cutler Street West and North and any works required to integrate the proposed highway to be adopted into the existing highway

- Introduction of raised tables at junctions of Houndsditch and Cutler Street West, Cutler Street West and Cutler Street North, Cutler Street North and Harrow Place/ White Kennet Street
- Changes to carriageway treatment on Cutler Street West
- Pedestrian priority measures on Devonshire Square and on White Kennet Street between Harrow Place and Stoney Lane. 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 and would be subject to any necessary traffic order making procedures.*
- The potential introduction of two-way traffic movement on Cutler Street North.

564. Through the evaluation and design process opportunities to improve the streets in line with the 10 healthy streets indicators, such as additional planting and seating, will be explored.

Monitoring and Administrative Costs

565. 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.

566. 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

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

Conclusion

568. 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.

569. Objections have been received from residents and third parties relating to the massing and bulk of the development, daylight and sunlight implications, the impact on the environment, impact on the amenity of

the immediately surrounding area and buildings, and the loss of Clothier Street. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.

570. The proposed development comprises the demolition of an unremarkable and outmoded office development and the replacement proposed delivers a high quality, triple aspect, office-led development with an outward facing socially inclusive cultural dimension and significant enhancements to the existing public realm 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.

571. 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 retail, community space and useable and increased public realm with flexible possibilities to support Petticoat Lane Market including storage and infrastructure for complementary popups.

572. These benefits would significantly enhance the vibrancy to the City's streets and create an active and engaging base to the building benefitting the City's diverse communities. These include:

- Community Space at ground and mezzanine level totalling 238sq.m (GIA) of flexible and adaptable space with a focus on urban greening and gardening supporting local needs, learning, sustainability with free access to local communities and school access
- Three retail units totalling 85sq.m (GIA) including one affordable unit (28sq.m GIA) which would be available at 60% of market rates
- Incubator space would be provided over floors 1 and 2 (4037sq.m GIA) including 23 desk spaces at 50% of market rate
- Opportunities for free storage space to support Petticoat Lane Market traders and the potential pop ups and kiosks along Cutler Street West will be secured through the S106 agreement and would be subject to demand and include locations, capacity, and hours of access.

573. The development would deliver high quality distinctive, world class architecture and would enrich and add visual interest to local townscape and Citywide skylines. The proposals will provide additional architectural and artistic collaborations supporting inclusiveness and working in partnership with local and diverse creatives, including heritage interpretation opportunities which would celebrate the history of area.

574. The proposal would deliver a tall building on a suitable site in accordance with Local Plan Policy CS14 and CS7, City Plan Policies S12, London Plan Policy 7.7 and London Plan D9. The proposal would not harm and would protect pan-London LVMF and local strategic views in accordance with Local Plan Policy CS13(1), London Plan Policies 7.11 and 7.12, draft City Plan 2036 Policy S13 and London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected Views SPD. The proposal would preserve the OUV/significance, authenticity and integrity of the Tower of London World Heritage Site, according with associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.

575. The proposal would preserve the special interest/significance and setting of designated heritage assets and non-designated heritage assets. The proposals would comply with the NPPF, London Plan Policy HC1, Local Plan Policies CS12 and DM12.1 and emerging policy S11, HE1 and HE2 . The proposals seek opportunities to enhance and celebrate heritage through artistic and cultural collaborations and interpretations.

576. In assessing any impacts special attention and considerable weight has been attached to statutory consultees advice and guidance including Historic England.

577. The scheme benefits from high levels of public transport accessibility, would be car-free except for two blue-badge parking spaces in the basement and would promote cycling and walking as healthy modes of travel. It would comply with the London Plan requirements for long and short stay cycle parking, including a number of short stay cycle parking spaces within the new public realm.

578. Further enhancements include improving pedestrian movement and comfort to the streets wrapping around the building by setting back the new building line. The increase in floorspace and occupation of the development places extra pressure on the comfort and safety of the City's streets. Overall, the pedestrian experience around the site is expected to significantly improve as a result of the proposals.

579. The existing Clothier Street is a service and refuse area which is poor quality in terms of public realm, safety and vibrancy and deemed to have no heritage value other than in name but does contribute to the permeability of the local area. To enable the deliverability of the scheme and its many benefits the existing route would be required to be stopped up. This impact is considered to be mitigated by the qualitative and quantitative benefits of the scheme in terms of public realm, pedestrian comfort, inclusiveness and safety. However, any stopping up would be subject to the statutory procedure.

580. The scheme delivers significant public realm enhancements, including an increase in quantity and quality of public realm. The perimeter spaces wrapping around the building would be outward facing, attractive and accessible spaces. There would be a net gain of approximately 173sq.m of new public realm and 27sq.m of public highway land.

581. The proposals would be particularly progressive and ambitious in terms of sustainability credentials for a tall building in the City of London.

- Operational carbon emissions reduced by 44% compared to a building regs compliant building, exceeding the minimum GLA requirement of 35%.
- Whole Life-Cycle carbon emissions reduced to comply with the GLA's aspirational benchmark
- Incorporation of thermal stores for waste heat to support development's space heating and share waste heat with the neighbouring Middlesex Street Estate
- Targeting an ambitious low operational energy use intensity in line with the London Energy Transformation Initiative's (LETI) target of 55 kWh/m2 (GIA) for the completed development. A raft of measures, e.g. relating to tenants agreements, power purchase agreements and reviewing the building services strategy are intended to be put in place to achieve this.
- On track to achieving highest ratings for BREEAM assessment "outstanding", WELL building standard "Platinum" and LEEDS standard "Platinum".
- Heat Rejection to Middlesex Estate to recirculate energy waste.

582. Urban greening is integral to the architecture and would be beneficial to all users of the building and would be experienced both from a distance and close proximity to the building. The planting and greening would be incorporated into the development through a combination of urban greening of the public realm and on all the buildings terraces and tree planting, thereby significantly increasing the biodiversity on site that would contribute to improvements of the wider area. The existing UGF on the site is 0.00 and the proposed is calculated at 0.53 which significantly exceeds policy requirements.

583. There is one major adverse impact on nearby open space and a small number of minor adverse impacts to nearby residential properties, in terms of loss of daylight and sunlight, and overshadowing. However, taking into account the BRE Guidance, it is considered that the proposed development would not reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, and would accord with Local Plan policy DM10.7 and Policy DE8 of the draft City Plan 2036.

584. Negative impacts during construction, such as noise and pollution, 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 future adverse impacts.

585. The impacts of the proposed development on residential amenity have been considered and it has been concluded that the impact on residential amenity would not be significant, and the development would comply with Local Plan relevant policies.

586. The environmental impacts of the proposal, including wind microclimate, thermal comfort, flood risk, and air quality have been addressed in the application documents. It is considered that the proposed development would not have any significant adverse impact upon the environmental conditions of the surrounding area, and would comply with relevant Local Plan policies.

587. This development would be a progressive approach to sustainable, circular, accessible and behavioural design and addresses many of the key issues facing the City, London and the UK by providing a state of the art workplace that contributes to the local environment, City workers and local communities and supports the agenda for the City and London's Covid recovery.

588. 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.

589. The Local Planning Authority 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.

590. Applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, it is considered that the proposed development complies with the development plan as a whole. Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied and planning obligations and other agreements being entered into under S106 of the Town and Country Planning Act 1990.

Background Papers

Application Submission Documents

Covering Letter	Dated 16.07.2021
Planning Statement	Dated 07.2021
Design and Access Statement ('DAS') (including Facade Access Strategy, Security Strategy, and Radiance Assessment)	Dated 07.2021
Culture Strategy and Plan	Dated 07.2021
Landscape Statement and Plans	Dated 07.2021
Lighting Strategy	Dated 13.07.2021
Environmental Statement (including Townscape Visual and Built Heritage Assessment as Volume 2)	Dated 06.07.2021
Statement of Community Involvement	Dated 07.2021
Economic and Social Benefits Assessment	Dated 07.2021
Equalities Statement	Dated 07.2021
Transport Assessment (including 'Interim Travel Plan and Cycle Promotion Plan', 'Delivery and Servicing Management Plan' and 'Pedestrian Movement Assessment')	Dated 07.2021
Waste Management Strategy	Dated 07.2021
Energy Statement	Dated 08.07.2021
Sustainability Statement	Dated 08.07.2021
Whole Life Cycle Carbon Assessment	Dated 08.07.2021
Circular Economy Statement	Dated 07.07.2021
Ventilation and Extraction Statement	Dated 09.07.2021
Utilities Statement	Dated 07.2021
Fire Strategy	Dated 16.07.2021
Flood Risk Assessment and Drainage Strategy	Dated 07.07.2021
Structural Report	Dated 08.07.2021
Phase 1 Contamination Report	Dated 06.07.2021
Biodiversity Report including biodiversity net gain assessment	Dated July 2021
Outline Construction Environmental Managemental Plan ('CEMP')	Dated 07.2021
Outline Construction Logistics Plan	Dated 07.2021
Thermal Comfort Assessment	Dated 15.07.2021
Radiance Report for Middlesex Street Estate (and Petticoat tower)	Dated 05.10.2021
Archaeological desk-based assessment (part of Environmental Statement)	Dated 2019
Archaeological evaluation (part of Environmental Statement)	Dated 2020
MOLA Evaluation Report (Archaeology) (part of Environmental Statement)	Dated 2020
Air Quality Assessment (part of Environmental Statement)	Dated 23.06.2021

Wind Microclimate (part of Environmental Statement)	Dated 10.06.2021
Health Impact Assessment (part of Environmental Statement)	Dated 07.2021
DP9 Response to Public Comments	Dated 28.10.2021

Consultation responses

Internal

Memo	Contract and Drainage Services	Dated 29.07.2021
Memo	Lead Local Flood Authority	Dated 26.08.2021
Memo	Access Team	Dated 06.09.2021
Email	Open Spaces	Dated 12.10.2021
Memo	District Surveyors	Dated 18.10.2021
Email	Cleansing Services	Dated 19.10.2021
Memo	Environmental Health	Dated 20.10.2021
Memo	Air Quality Officer	Dated 20.10.2021
Email	City Police	Dated 01.11.2021

External

Letter	Historic England	Dated 29.07.2021
Email	NATS Safeguarding	Dated 22.10.2021
Email	Transport for London	Dated 19.08.2021
Letter	Natural England	Dated 12.08.2021
Email	Crossrail Ltd	Dated 06.08.2021
Email	Network Rail	Dated 02.08.2021
Letter	Environment Agency	Dated 21.10.2021
Email	London Borough of Hackney	Dated 15.08.2021
Letter	London Borough of Tower Hamlets	Dated 13.08.2021
Email	Thames Water	Dated 06.08.2021

Representations

Email	Linda Fallon	Dated 11.08.2021
Email	Ms. Sandra Mc Bean Ruiz	Dated 13.08.2021

Online	Mr Alberto Mascella	Dated 19.08.2021
Online	Mr Jeffrey Boloten	Dated 25.08.2021
Email	Mark Lemanski	Dated 27.08.2021
Online	Ms Vicky Stewart	Dated 27.08.2021
Online	Mr Roger Way	Dated 29.08.2021
Online	Miss Inese Smukste	Dated 29.08.2021
Online	Miss Soo Cheong	Dated 29.08.2021
Online	Mr Shahram Najafi	Dated 29.08.2021
Online	Mrs Laura Chan x2	Dated 29.08.2021
Online	Miss Astrid Kirchne	Dated 29.08.2021
Online	Mr Paul Braithwaite	Dated 29.08.2021
Online	Mr Sean Lee	Dated 29.08.2021
Online	Mr Ian Hartog	Dated 30.08.2021
Online	Ms Lisa Hollick	Dated 30.08.2021
Email	Martha Perez Ruiz	Dated 30.08.2021
Online	Mr Giuliano Pistoni	Dated 30.08.2021
Online	Miss Liz Woolcock	Dated 30.08.2021
Online	Mr Andre Skeete	Dated 30.08.2021
Online	Mrs Philomena Levy	Dated 30.08.2021
Online	Mr Ray Ruzzaman	Dated 30.08.2021
Email	Julian Bailey	Dated 30.08.2021
Online	Ms Silvia Montoto	Dated 07.09.2021
Email	Lana Joyce	Dated 05.10.2021
Online	Miss Anna Godefroy	Dated 20.10.2021
Email	Damien Vaugh	Dated 26.10.2021
Email	Miss Vicky Stewart	Dated 28.10.2021
Email	Ms. Sandra Mc Bean Ruiz	Dated 04.11.2021

APPENDIX A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS
Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, alternatives and design evolution, the proposed development, demolition and construction, socio-economics, traffic and transport, air quality, noise & vibration, archaeology (buried heritage), wind microclimate, daylight sunlight overshadowing solar glare & light pollution, effect interactions, likely significant effects and conclusions, mitigation and monitoring schedule, and townscape visual and built heritage assessment, including technical appendices and non-technical summary. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES as, where relevant, referred to in the report.

The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, as well as other measures to ensure the scheme is acceptable. These would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

APPENDIX B

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 D9 (Tall Buildings) sets out criteria where tall and large buildings will be considered acceptable, in principle. This includes the need to "incorporate the highest standards of architecture and materials, including sustainable design and construction practices ...[to] ...have ground floor activities that provide a positive relationship to the surrounding streets ... [to] ... contribute to improving the permeability of the site and wider area, where possible ... [and to] ... make a significant contribution to local regeneration". There is also a requirement for proposed tall buildings to be assessed in terms of potential adverse effects on their surroundings in terms of microclimate, wind turbulence, overshadowing and noise.

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 El (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 we!! 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 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)
- Housing SPG (2017)

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

HL9 Health Impact Assessments

S2 Safe and Secure City

SA1 Crowded Places

SA3 Designing in security

HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retailing

RE2 Retail links

S6 Culture, Visitors and the Night -time Economy

CV2 Provision of Visitor Facilities

CV5 Public Art

S7 Smart Infrastructure and Utilities
S8 Design
DE1 Sustainability requirements
DE2 New development
DE3 Public realm
DE5 Terraces and viewing galleries
DE6 Shopfronts
DE8 Daylight and sunlight
DE9 Lighting
S9 Vehicular transport and servicing
VT1 The impacts of development on transport
VT2 Freight and servicing
VT3 Vehicle Parking
S10 Active travel and healthy streets
AT1 Pedestrian movement
AT2 Active travel including cycling
AT3 Cycle parking
S11 Historic environment
HE1 Managing change to heritage assets
HE2 Ancient monuments and archaeology
HE3 Setting of the Tower of London World Heritage Site
S12 Tall Buildings
S13 Protected Views
S14 Open spaces and green infrastructure
OS1 Protection and Provision of Open Spaces
OS2 City greening
OS3 Biodiversity
OS4 Trees
S15 Climate resilience and flood risk
CR1 Overheating and Urban Heat Island effect
CR3 Sustainable drainage systems (SuDS)
S16 Circular economy and waste
CE1 Zero Waste City
S21 City Cluster
S27 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Air Quality SPD (July 2017);

Archaeology and Development Guidance SPD (July 2017);

City Lighting Strategy (October 2018);

City Transport Strategy (May 2019);

City Waste Strategy 2013-2020 (January 2014);

Protected Views SPD (January 2012);

City of London's Wind Microclimate Guidelines (2019);

Planning Obligations SPD (July 2014);

Open Space Strategy (2016);

Office Use SPD (2015);

City Public Realm (2016);

Cultural Strategy 2018 – 2022 (2018).

Other

Tower of London World Heritage Site Management Plan

Relevant Local Plan Policies

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.

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.

DM1.3 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.

DM3.2 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.

CS4 Seek planning contributions

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

CS7 Meet challenges of Eastern Cluster

To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City.

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.

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

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

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.4 Archaeology

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

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

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.

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 recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

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

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

CS18 Minimise flood risk

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

DM18.2 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.

DM20.3 Retail uses elsewhere

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

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.

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.

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:

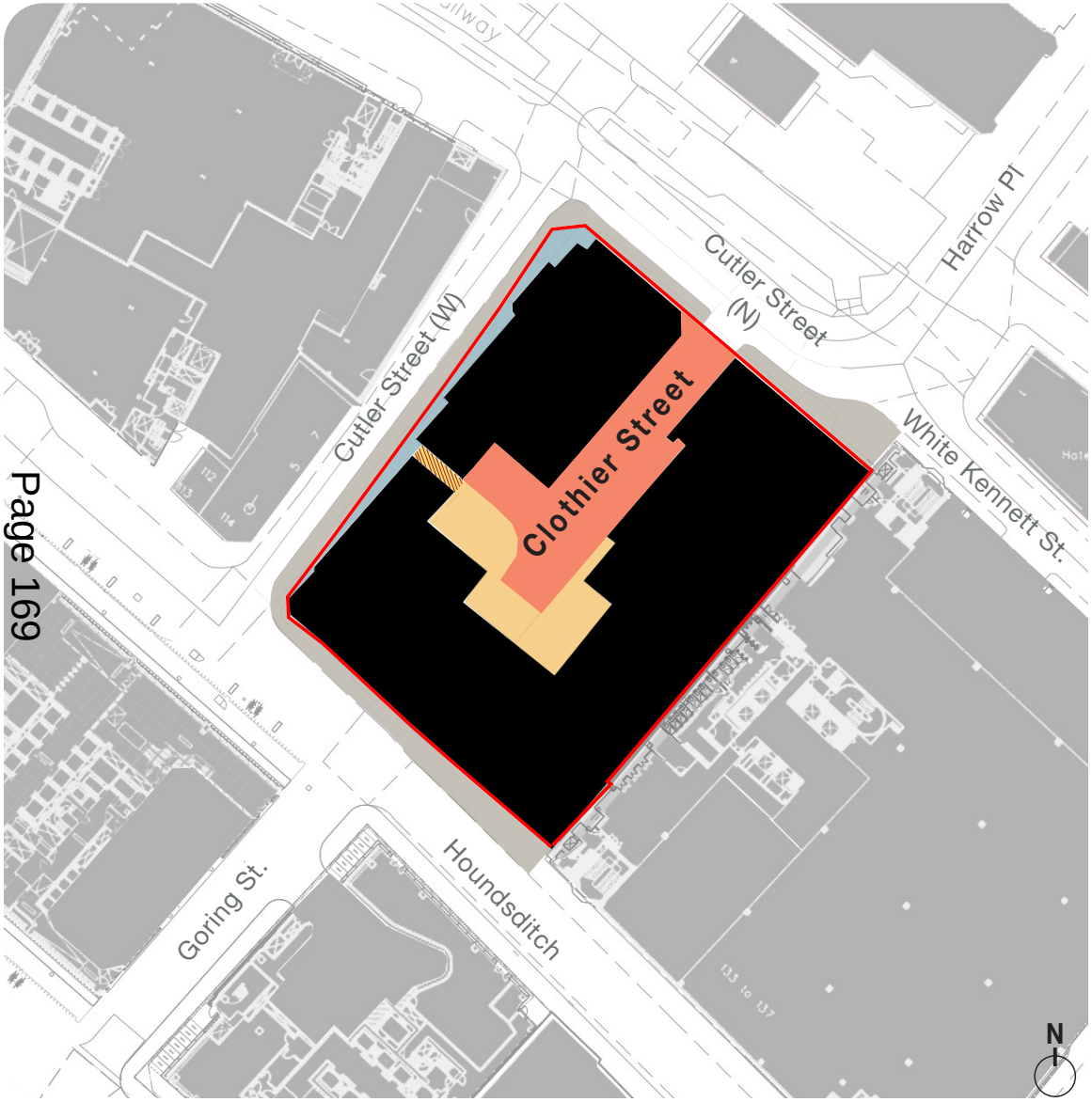
a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
b) in locations which are convenient to the communities they serve;
c) in or near identified residential areas, providing their amenity is safeguarded;
d) as part of major 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.

APPENDIX C

Stopping Up Plan and Plan of Highway to be declared

Existing Site Ownership



Area of Highway to be Stopped Up at Clothier Street
344.98 sqm*

Private passageway to Clothier Street (publicly accessible)

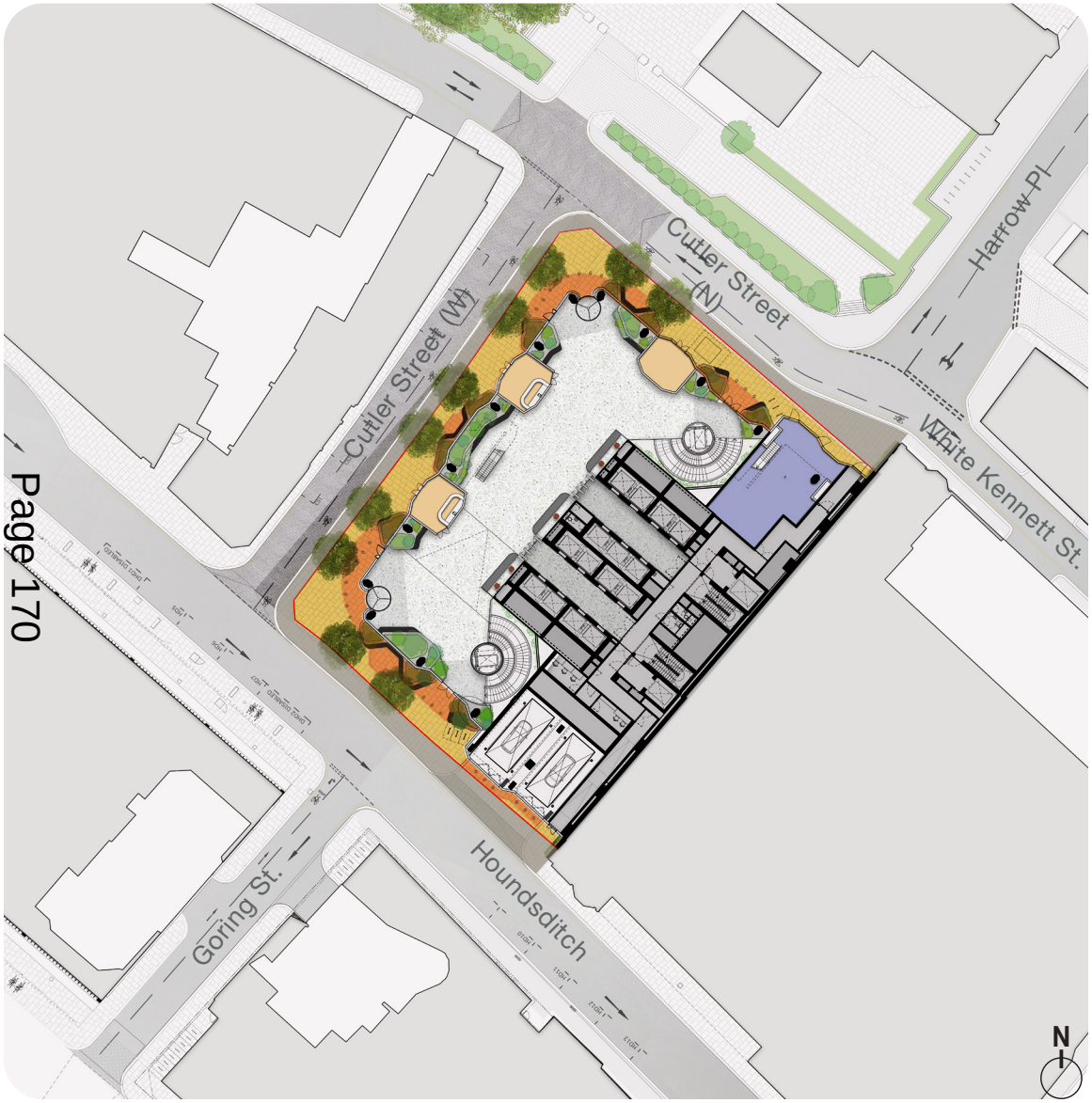
Private service area/bin store/ informal parking (no public access)

Publicly accessible pavement within the Site boundary

Publicly accessible pavement outside the Site boundary

**Figure as advised by City of London on 02.11.2021*

Proposed Public Realm and New Public Highway Area



Area of Highway to be declared at Cutler Street/Houndsditch
372.72 sqm*

Publicly accessible private land / Public Realm

Publicly accessible pavement outside the Site boundary

**Figure as advised by City of London on 02.11.2021*

SCHEDULE

APPLICATION: **21/00622/FULEIA**

115 - 123 Houndsditch London EC3A 7BU

Demolition of existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), flexible retail / cafe use (Class E); community space (Sui Generis), ancillary basement cycle parking, servicing and plant; new public realm and highway works; and other works associated with the development.

(The proposed development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of flexible retail / cafe floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; Total floorspace 66,867 sq.m; Overall Height 116.995m AOD).

(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.)

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 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.

4 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.
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.

5 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the guidelines.

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.

6 Prior to the commencement of development a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.
REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

7 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.

8 Prior to the commencement of the development an update to the approved Circular Economy Strategy shall be submitted to and approved in writing by the Local Planning Authority, to reaffirm the proposed strategy or demonstrate improvements, and that demonstrates 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.

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

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: 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.

10 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. 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.
Within 3 months of 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.

11 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

12 No works of excavation beyond the existing basement shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

13 Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not

limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation

14 Prior to the commencement of the development (other than demolition), an updated energy strategy shall be submitted to and approved in writing by the Local Planning Authority, providing details on how the development would reduce carbon emissions in particular from the incorporation of roof and facade mounted PV panels if identified as an effective measure to reduce carbon emissions.
REASON: To demonstrate that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

15 No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.
REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

16 Prior to construction (excluding any works of demolition) the submission of details of a Fire and Emergency Escape Strategy for all building users (including people with disabilities) including 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 (after consultation with the London Fire Brigade, Building Control Health and Safety Team) and the strategy

shall remain in place thereafter. The development shall be carried out in accordance with the approved Fire and Emergency Escape Strategy details.
REASON: In the interests of the safety of occupants of the buildings in the event of a fire or emergency in accordance with City of London Local Plan policy CS3.

17 No development other than demolition shall begin until details of such measures as are necessary within the site to resist structural damage and to protect the approved building and the new public realm within the site, from an attack with a road vehicle or road vehicle borne explosive device, have been submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. The development shall be carried out in accordance with the approved details.
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

18 Prior to construction, details of the equipment for the Heat Transfer system to the Middlesex Street Estate and thermal storage facilities within the site shall be submitted to and approved in writing by the Local Planning Authority. The approved equipment and thermal storage facilities shall be installed prior to occupation of the development and remain in situ for the lifetime of the development.
REASON: To minimise carbon emissions in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.

19 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.

20 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and

minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.
REASON: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure.

21 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.
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.

22 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.

23 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, pumps, green and blue roof systems, green walls, rainwater harvesting systems including the irrigation system, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 0.4l/s from the existing sewer connection, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 53m3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.

(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory; and
(d) Clarification on whether the attenuation tank will discharge via a pumped or gravity fed system.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3

24 No construction shall take place within 5m of the water main unless otherwise agreed with Thames Water. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.
REASON: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

25 Before the works thereby affected are begun sample panels of agreed sections of the facades shall be built, inspected on-site (or by another agreed method) 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.

26 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 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, terracotta piers and clear details, aluminium clad piers, facade planters, unitised curtain walling systems, 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 elevations including all, integrated seating;
(f) 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;
(g) details of all drainage, irrigation and rainwater harvesting;
(h) details of the integration of M&E and building services into the external envelope;
(i) details of retail units;
(j) details of the community use unit;
(k) details of servicing bay including internal colour scheme and lighting;
(l) details of the internal Y-props and soffit to lower levels including colours and materials;
(m) details of the roof top mechanical plant including integrated green wall screening.
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.

27 Before any works thereby affected are begun details and the location and specification of the PV panels shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.
REASON: To ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

28 Details of the position and size of the green/blue roof(s), the type of planting and the contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those

approved details and maintained as approved for the life of the development.
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.

29 All unbuilt surfaces, including terraces/balconies and public realm, shall be treated in accordance with a landscaping scheme, including details of:
(a) the position, size and types of planting of the green roof, green roof, climbers and within planters;
(b) details of the final Urban Greening Factor of the scheme;
(c) Irrigation, including provision for harvesting rainwater run-off from road ground and roof surfaces to supplement irrigation;
(d) Soil including details of the type and depths of soil and substrates;
(e) Species and selection of trees including details of its their age, growing habit, girth of trunk, how many times transplanted, root development and contribution to enhance biodiversity;
(f) Planting pit size and construction, tree guards;
(g) Details of all soft landscaping including species and contribution to enhance biodiversity;
(h) Seating;
(i) Paving materials;
(j) maintenance plans for all proposed landscaping.
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.

30 Before any works thereby affected are begun details of measures to prevent jumping or falling from the development shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development.
REASON: In the interests of safety in accordance with the following polices of the draft City Plan 2036: DE2 and DE5.

31 Prior to any plant being installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished

development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.
REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6

32 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 pursuant to this consent shall be carried out 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

33 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.

34 Before the shell and core of the building is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Local Lead 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, its aims and objections 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

35 A post construction BREEAM assessment demonstrating that a target rating of 'Outstanding' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating) 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.

36 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

37 No cooking shall take place within any Class E use hereby approved until fume extract arrangements and ventilation or another agreed system 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.

38 (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.

39 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 with the following policy of the Local Plan: DM15.7.

40 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.
A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

41 Prior to first occupation details of signage and interpretation to include the history of the site shall be submitted to and approved in writing by the Local Planning Authority, to include location, materials and fixing details. The signage shall be installed on site in accordance with the approved details and remain in situ for the lifetime of the development.
REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.

42 No part of the development shall be occupied until confirmation has been provided and agreed with the Local Authority in consultation with Thames Water that either:
(a) all water network upgrades required to accommodate the additional flows to serve the development have been completed; or
(b) 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

43 Once the building construction is completed and prior to the development being occupied (or, if earlier, prior to the development being handed over to a new owner or proposed occupier) a post-completion Circular Economy report shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.

44 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. 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 no more than 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.

45 Prior to occupation of the building hereby permitted the following details relating to external signage shall be submitted to and approved in writing by the Local Planning Authority and all signage placed on the development site shall be in accordance with the approved details:

(a) A Signage Strategy for the retail units;
(b) A Signage Strategy for the community centre; and
(c) A Signage Strategy for the short term cycle parking within the basement.
All signage relating to the short term cycle parking (as approved in the signage strategy) must be erected and in place prior to occupation of the 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: DM10.1, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.

46 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.

47 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

48 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.

49 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.

50 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.

51 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.

52 The terraces and balconies hereby permitted shall not be used or accessed between the hours of 23.00hrs on one day and 07.00 hrs on the following day, other than in the case of emergency.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3

53 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.

54 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.

55 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 948 long stay pedal cycle spaces, and a minimum of 33 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

56 A minimum of 5% of the long stay cycle spaces shall be accessible for adapted cycles.
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling B, emerging City Plan policy 6.3.24.

57 948 lockers and 94 showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.

REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

58 Unless otherwise agreed 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.

59 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.

60 Goods, including fuel, delivered or collected by vehicles (excluding cycles and motorcycles) 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.

61 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.

62 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

63 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.

64 Two electric charging points shall 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: VT2.

65 The two car parking spaces 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 2036: 6.13D and 6A.2 and London Plan: T6.5.

66 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: VT2.

67 All ecological data gathered to support this application and gathered as part of ongoing monitoring to inform management, shall be submitted to the relevant Local Environmental Records Centre (LERC) currently Greenspace Information for Greater London (www.gigl.org.uk).
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.

68 The retail premises hereby permitted shall not be open to customers between the hours of (23:00) on one day and (07:00) on the following day.
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.

69 The areas shown on the approved drawings as offices (Class E), retail use (Class E), and community use (Sui Generis) shall be used for those purposes only and for no other purpose (including any other purpose in Class E and Sui Generis as appropriate) 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 amending or 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.

70 No plant or telecommunications equipment shall be installed on the exterior of the buildings, 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.

71 The development shall provide:
- 58,284 sq.m. (GEA) of office floorspace (Class E);
- 98 sq.m. (GEA) retail use (Class E); and
- 259 sq.m (GEA) of publicly accessible community use floorspace (Sui Generis)
REASON: To ensure the development is carried out in accordance with the approved plans.

72 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:
18136-AHMM-ZZ-01-DR-A-PL 101 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 102 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 103 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 104 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 105 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 106 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 107 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 108 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 109 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 110 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 111 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 112 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 113 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 114 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 115 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 116 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 117 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 118 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 119 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 120 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 121 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 122 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 123 Rev P00
18136-AHMM-ZZ-01-DR-A-PL 124 Rev P01
18136-AHMM-ZZ-B1-DR-A-PL099 Rev P00
18136-AHMM-ZZ-B2-DR-A-PL098 Rev P00
18136-AHMM-ZZ-B3-DR-A-PL097 Rev P00
18136-AHMM-ZZ-B4-DR-A-PL095 Rev P00
18136-AHMM-ZZ-B4M-DR-A-PL096 Rev P00
18136-AHMM-ZZ-GF-DR-A-PL100 Rev P01
18136-AHMM-ZZ-GF-DR-A-PL100M Rev P00
18136-AHMM-ZZ-RF-DR-A-PL125 Rev P00
18136-AHMM-ZZ-XX-DR-A-PL200 Rev P01
18136-AHMM-ZZ-XX-DR-A-PL201 Rev P01

18136-AHMM-ZZ-XX-DR-A-PL202 Rev P01
18136-AHMM-ZZ-XX-DR-A-PL203 Rev P01
18136-AHMM-ZZ-XX-DR-A-PL300 Rev P01
18136-AHMM-ZZ-XX-DR-A-PL301 Rev P01
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

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

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

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

2 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 Any Building Proposal which includes catering facilities will be required to be constructed with adequate grease traps to the satisfaction of Thames Water Utilities Ltd or their contractor.

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

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 www.thameswater.co.uk. Please refer to the Wholsesale; Business customers; Groundwater discharges section.

From: PLN - Comments
To: Linda Fallon
Subject: RE: PLNComments
Date: 13 August 2021 13:29:00

From: Linda Fallon
Sent: 11 August 2021 09:39
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: PLNComments

THIS IS AN EXTERNAL EMAIL

Having lived at Petticoat Sq (Harrow Place)for 48 yrs, all the surrounding buildings were demolished & rebuilt but they were not permitted to be built any higher than the original buildings & the noise was horrendous during these works,so why now are they planning a 23+storey office block towering over the estate which will block our views & possibly the afternoon sun,& how many years of noise & disruption will this cause to residents,especially Harrow place side,I hope this is taken in to consideration....Regards Linda Fallon.

From:	sandra mcbean
To:	PLN - Comments
Subject:	Reference number 21/00622/FULEIA Case Officer: Liam Hart
Date:	13 August 2021 12:18:16

THIS IS AN EXTERNAL EMAIL

Location: 115 - 123 Houndsditch London EC3A 7BU

Dear Mr. Liam Hart,

I am concerned with the application for the construction of a new building at 115-123 Houndsditch. I have reviewed the plans online and have come to the conclusion that the repercussions of this project cannot be ignored as it poses not only a problem to the residents of the estate but also to the environment. I will outline the problems of the proposed construction, including examples and evidence.

This building will be another high-rise building that will lead to a greater decrease of natural light for numerous flats on the Middlesex Street Estate. A decrease in the natural light reaching flats in the Middlesex Street Estate will have consequences. This means residents will see their energy bills increase as they are forced to use more electricity to light their homes which will also have an environmental impact.

Moreover, the relationship between light and health is well documented. Natural light is very important and without proper exposure, many health problems can occur. Perhaps to counter my point, one could say well residents should go outside and receive more exposure to natural light. As more businesses have shifted to working from home even after the two lockdowns because of the pandemic, more people will have to spend a large portion of their day indoors. A solution such as going outside does not work for everyone and does not take into consideration those who may not be able to go outside, for long hours to receive long exposure to natural sunlight. Also, the temperamental UK weather makes it harder as well.

Adequate lighting is essential to ensure proper visual performance and safety. A systematic review (source: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7828303/) found that natural lighting in homes is linked to improved sleep, mental and physical health. Even indirect sunlight exposure through glass has been found to have a natural disinfectant effect - weakening bacteria. (source: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6193304/). There are countless academic papers I could cite as evidence for the need for adequate natural lighting. So, how many more high-rise buildings are we going to allow to be built before all the residents of Middlesex Street Estate find themselves having to constantly use artificial light? For it is indisputable that artificial lighting can never truly replace natural light from the sun.

The developers say they have ‘taken on the challenge to deliver a Net Zero Carbon building’. With my knowledge of science, reading papers leads me to be skeptical of this. Let us suppose they do build a property that achieves high sustainability ratings. Many of these benchmarks only take into consideration the ‘greenness’ of a building once construction is complete and do not look at the future impacts when the building is in operation. Also on the topic of construction. A large project like this will require many materials, and even if the materials are sustainable, the transportation of the materials which require energy will negate some of the low carbon benefits.
Overall, the principle of ‘Net Zero Carbon’ in this project is misleading because a lot of factors that are involved in the construction of a large project which leads to greater energy consumption, such as transportation, are omitted.

The proposals focus on this idea of ‘sustainability’ yet fail to mention the energy costs of demolition. The aesthetics of the existing build may not be the nicest but does this call for complete demolition? The existing build only dates to 40 years ago and is being called to be demolished. How many years will the proposed build last? Demolishing one build to build another is not sustainable, the shortening of the life span of buildings is not sustainable.

The proposal of retail amenities is perhaps attractive to residents. However, if you take into consideration the cost of rent in these units. I highly doubt many small businesses will be able to operate in these units. Nearby, in Spitalfields, many cherished and unique small businesses were forced to close due to the high rent costs. Those empty spaces have been filled by brands that we already see on High Street. Will the retail amenities in the new building truly complement Petticoat Lane Market if the units are filled by multi-million companies?

The height of the new build will disrupt city views. As you walk down Harrow place you are able to see the Gherkin, which has won many architectural awards. If the proposed project is completed, this view will be no more. In fact, what will become of London’s skyline, if more and more of these projects for high-rise buildings are accepted?

In conclusion, there are many issues with this project proposal. I oppose a project which will negatively impact the lives of the residents to move forward. I can agree with the sentiments of wanting to create a greener space but I cannot agree with the construction of another high-rise, glass office building. The City of London already has a surplus of empty office spaces; there is no need for more. This project is a waste of resources and if one truly wanted to improve the area they would look for a different approach.

Yours faithfully,

Ms. Sandra Mc Bean Ruiz

8d Petticoat Tower

Middlesex Street Estate
E1 7EE
London

Comments for Planning Application 21/00622/FULEIA

Application Summary
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Case Officer: Liam Hart

Customer Details
Name: Mr Alberto Mascella
Address: 117 119 Houndsditch 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:Hello,
I'm the store manager of Houndsditch starbucks number 117/119 Houndsditch.
I saw this paper I wanted to know in which way my business, after approval of this construction, will be affected,
Thank you

Alberto Mascella
Store manager
50683 Houndsditch

PS: if it will be, for how long approximately?

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details
Name: Mr Jeffrey Boloten
Address: 425 Petticoat Square London

Comment Details
Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:Dear Sir/Madame, / Attn: Liam Hart

I wish to officially and strongly object to the Planning Application as described above. There is a more extensive Middlesex Street Estate Residents' Association group objection that is now being drafted and circulated, but I would like very much to register my personal strong objections to this Application, for the following reasons:

* The size and scale of this proposed office building is completely inappropriate, in relation to the close proximity to a residential estate, and in relation to the modest scale of the buildings, and community amenities directly next to this planned office tower.
* The tower, as described would seriously detrimentally effect to residents of the Middlesex Street Estate in the following ways:

/ loss of access to light, and to the essential sunlight for the communal podium area / loss of daylight for the community shops and cafes on Harrow Place / loss of privacy / the overbearing scale of a building blocking all visual aspects surrounding the estate / major noise and loss of air quality for the extended multi-year duration of this major building works.
* The loss of / blockage of the historic Clothier Street, apparently built over by this development

Yours sincerely,

Jeffrey Boloten

425 Petticoat Square
London E1 7EB

From: [redacted]
To: PLN - Comments
Subject: 21/00622/FULEIA
Date: 27 August 2021 09:11:36

THIS IS AN EXTERNAL EMAIL

Dear Mr Hart,

I am writing to object to proposals for the proposed development ref 21/00622/FULEIA in advance of a forthcoming joint statement by residents of Middlesex Street Estate.

The proposal is for a highrise building of underwhelming architectural resolution and a height greater than 60-80 St. Mary Axe (The Can of Ham), which will sit at the southern end of Harrow Place. It will overshadow the flats and podium courtyard of the adjoining Middlesex Street Estate, as well as Harrow Place and Devonshire Square. It will substantially reduce daylight and sunlight to homes and the public realm, obscure views of the sky, and form an oppressive presence in an already built up area with limited public spaces. It will also set a precedent for other oversized buildings along Cutler Street.

I request that the proposals are changed for the proposed development to be no higher than Premier Place along the Cutler Street end of the site, and decisively lower than the Can of Ham on the Houndsditch side of the site, in order to reduce the detrimental effect of this development on the adjoining public spaces and buildings, especially the Middlesex Street housing estate. In fact, Question 11 of the developer's consultation questionnaire in August 2020 suggested "I support the principle of the site seeking to step-down from the Cluster of tall buildings". Yes I do.

Middlesex Street Estate is located in an area with stark under provision of green and amenity space. The raised podium is therefore of highest importance to provide play and gardening space, especially for children and elderly residents who cannot travel far on their own. Sunlight is integral to the activities of planting, playing and socialising. The proposed massing would reduce sunlight and daylight to the podium when it matters most, in the afternoon. No offer of monetary or other compensation could make up for the deprivation of this much needed and loved communal resource, which would have a direct knock on effect on the mental and physical wellbeing of vulnerable residents.

The flats on Middlesex Streets Estate are much smaller than the minimum size stipulated in the GLA housing supplementary housing guidance. They therefore especially depend on sunlight, daylight, and views. Again, any reduction would result in a huge detrimental impact on the housing and the physical and mental wellbeing of its residents.

Harrow Place and its ground floor businesses bring much needed social presence to an area with considerable problems of antisocial behaviour including substance abuse, which is mitigated by the informal surveillance that the restaurants and their spill out uses especially outdoor seating provide. The sense of social activity also serves to mitigate the density and lack of green space of the street. The businesses, already struggling to make ends meet post covid, depend on their midday sunny outdoor seating, which would be strongly impacted by the shadow the proposed building would cast at lunch time.

The edge of the city requires careful architectural articulation to negotiate the higher office buildings of the City Cluster with the adjoining Victorian buildings and the Wentworth Street Conservation area. The proposed building would form an overbearing presence and set a precedent for other forthcoming redevelopments to form a cliff edge segregating the City from the adjoining urban grain. Clothier Street might be a curious remnant of historic Street patterns, but it is exactly those traces of the past history that makes London exciting and shouldn't just be dismissed as inconvenient.

The proposed building is not only too high, it is also bloated in its poor formal articulation and will diminish a cluster of stand-alone office buildings with refined sculptural resolution. The only purpose of its form seems to be to extrude the footprint to the biggest get-away-with-able height in order to maximise real estate, with no regard to its urban setting and hardly any attempt to contribute architecturally to the City.

I trust that you will consider the harm the proposal in its current form would inflict on the residents, businesses, and visitors to the area, as well as the damage it would cause to the urban grain of the area, and insist on a substantial reduction in size.

With best wishes,

Mark Lemanski
424 Petticoat Square
London E1 7EB

Comments for Planning Application 21/00622/FULEIA

Application Summary
Application Number: 21/00622/FULEIA
Address: 115 - 123 Houndsditch London EC3A 7BU
Proposal: Demolition of existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), flexible retail / cafe use (Class E); community space (Sui Generis), ancillary basement cycle parking, servicing and plant; new public realm and highway works; and other works associated with the development. |cr|(The proposed development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of flexible retail / cafe floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; Total floorspace 66,867 sq.m; Overall Height 116.995m AOD).|cr|(The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.)
Case Officer: Liam Hart

Customer Details
Name: Ms Vicky Stewart
Address: 10C Petticoat Tower Petticoat Square London

Comment Details
Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object on the following grounds:

MASS & HEIGHT:
The development is massively out of scale with its immediate surroundings. The MIDDLESEX STREET ESTATE - MSE - will be overwhelmed.

LIGHT:
Middlesex Street Estate will suffer majorly from loss of daylight and sunshine to its many flats in Petticoat Tower & Petticoat Square.

The Podium Gardens & Children's Playground will suffer similarly.

Daylight Analysis (ES_3_Appendix DSOSGLP_Annex_3-719087.PDF) shows my Living Room-Kitchen on the 10th Floor will lose a staggering 10.02% light, wholly unacceptable.

HARROW PLACE (MSE): A row of independent shops & cafes with outside seating, will be plunged into perpetual shade. The street currently enjoys sun through the afternoon. Should the development be much lower and stepped back the impact on the shops and resident's flats will be considerably lessened.

AMBIENT LIGHT: Office lights are rarely turned off. My windows face into the City offices and even during Lockdown when they were empty they burned 24/7. Inevitably this new development will create yet another source of constant electric light beamed, this time, directly into our windows.

CONSTRUCTION NOISE and POLLUTION:
This will be completely unacceptable and will go on for years. Many residents are retired, some very elderly or frail. Many now work from home or work evening and night shifts. Children on the estate play on the podium. Home will no longer be a physically or mentally healthy place for them.

TRAFFIC:
Despite the use of bicycles there will be a huge amount of extra vehicle use generated with deliveries & visitors.

CLOTHIER STREET:
Although it looks insignificant it is an ancient thoroughfare with a strong local history as a major clothing area. It must not be erased.

SETTING A PRECEDENT:
The development's WINDOWLESS WALL anticipates a major development alongside, on Five Acre Square, and expected to be of the same bulk & height as Cutler Street. This would have considerably more impact on the MSE.

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details

Name: Miss Astrid Kirchner
Address: 18B Petticoat Tower Petticoat Square London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I am writing to object to proposals for the proposed development ref 21/00622/FULEIA. The proposal is for a highrise building of a height greater than 60-80 St. Mary Axe (The Can of Ham). It will overshadow the flats and podium courtyard of the adjoining Middlesex Street Estate, as well as Harrow Place and Devonshire Square. It will substantially reduce daylight and sunlight to homes on Middlesex Street Estate and the public realm, obscure views of the sky, and form an oppressive presence in an already built up area with limited public spaces. It will also set a precedent for other oversized ugly buildings along Cutler Street. I request that the proposals are changed for the proposed development to be no higher than Premier Place and the Postoffice along Cutler Street. No one will ever be able to replace the loss of light and subsequent quality of living on Middlesex Street Estate for residents if the building is any higher than Premier Place. In addition to the current proposals detrimental effects on the value of residentisl property on the estate. Plus it will subject residents to years of noise and building works which will already be an unbearable disruption with no benefits to us (we already have a community center).
Also access to Clothier street as a historically important street should be retained for the public

realm.
I therefore request that the proposal is significantly improved to be a lot (!!!) lower so to completely avoid any loss of light for Middlesex Street Estate and so that it adds to the value for residents living in the area as opposed to destroying the quality of life for residents with the current proposal.

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details

Name: Miss Inese Smukste
Address: 620 Petticoat Square London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I object to the proposal as it will obscure sun and daylight in the flat.

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details
Name: Mrs Laura Chan
Address: 443 petticoat square London

Comment Details
Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
- Traffic or Highways

Comment:I also object to the complete take over of Clothier Street in the development proposal. The street is a public asset and right of way.
It's development and future use needs to take into account the needs of the community now and going forward.

For example, at least the ground floor levels must be kept as free access for pedestrians and emergency vehicles

If they must build on the upper levels then the building can have a lease and pay market rent to the council to boost council funding in perpetuity, so that the money is not squandered by any one council administration. For ease of calculation and administration, the market rent can tied to the actual rental value of the relevant office spaces.

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details

Name: Mrs Laura Chan
Address: 443 Petticoat Square London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Residential Amenity
- Traffic or Highways

Comment:The proposed development is far far too big and will block light to the Middlesex Street Estate, particularly the podium garden which is a valuable recreation resource for the estate residents, to use physically and also to look at.
The blocking of light to our estate will also prejudice the future installation of solar power generation on our estate rooftops.
The huge size is also out of character to neighbouring buildings.
The scale of the proposed development needs to be reduced substantially, to fit in with neighbouring buildings.
The suggestion of providing waste heat from the building to our estate is a white elephant, very insulting to our intelligence. There is no absolute commitment to build an effective heat transfer infrastructure, and then the amount of usable heat that will be transferred is questionable since the new building is powered only by electricity, any usable 'waste' heat that may be recaptured would

be more effectively used for water heating, etc within the building itself!
Finally, in my view, the building design offers no architectural design contribution, insufficient greenery contribution, and insufficient substantiated amenity contribution to the local area.

Comments for Planning Application 21/00622/FULEIA

Application Summary

Application Number: 21/00622/FULEIA
Address: 115 - 123 Houndsditch London EC3A 7BU
Proposal: Demolition of existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), flexible retail / cafe use (Class E); community space (Sui Generis), ancillary basement cycle parking, servicing and plant; new public realm and highway works; and other works associated with the development. |cr|(The proposed development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of flexible retail / cafe floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; Total floorspace 66,867 sq.m; Overall Height 116.995m AOD).|cr|(The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.)
Case Officer: Liam Hart

Customer Details

Name: Mr Paul Braithwaite
Address: 221 Petticoat Square London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I strongly object to your ridiculous plans I am a resident of Middlesex St and this mammoth building will steal vital natural light from our homes and gardens What I don't understand and would appreciate an answer is why build more buildings at what must be astronomical costs when there are so many unoccupied buildings in the City of London but my main objection is the disruption this will cause to a residential area

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details

Name: Mr Roger Way
Address: Middlesex Street Estate Residents' Association 18A Petticoat Tower, Petticoat Square London

Comment Details

Commenter Type: Neighbour
Stance: Customer made comments neither objecting to or supporting the Planning Application
Comment Reasons:
- Residential Amenity

Comment:This comment is to place on record that members of the Middlesex Street Estate Residents' Association (MSERA) are in the process of reviewing this application, including participation in the developer's 'Cutler Street Community Information Day' on 7 September. A joint statement by members of MSERA will be submitted before the end of September.

The above approach follows a virtual meeting with the planning officer where assurances were made to the Chair of MSERA that comments submitted in a reasonable time after the formal deadline would be accepted and considered in the same way as those submitted earlier.

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details

Name: Mr Sean Lee.
Address: 14a Petticoat Tower, Petticoat Square London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:1. Reduce of Sunlight
2.closure of an existing road

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details

Name: Mr Shahram Najafi
Address: 604 Petticoat Square London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:
1. The new proposed building will be too high
2. Loss of light directly into my property.

Comments for Planning Application 21/00622/FULEIA

Application Summary

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Case Officer: Liam Hart

Customer Details

Name: Miss Soo Cheong
Address: 7 b Petticoat tower London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:Is already crowed and noisy not more view.
Too many traffics .

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details

Name: Mr Andre Skeete
Address: 608 Petticoat Square London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Skyscraper will be too high.
Loss of daylight and sunlight into my property.
Loss of light quality onto residents open podium area.

Comments for Planning Application 21/00622/FULEIA

Application Summary

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Case Officer: Liam Hart

Customer Details

Name: Mr Giuliano Pistoni

Address: 601 petticoat square London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Have been living in my flat for the last 20 years and the noise is constantly outside my door step.

I object the proposal and I hope won't be happening

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details

Name: Mr Ian Hartog
Address: 459 Petticoat Square Middlesex Street Estate Greater London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:Dear Mr.Hart,

I wish to object to the planned development of 115-123 Houndsditch.
The development of a 23 storey skyscraper so close to the nearby Middlesex Street Estate will have severe implications.
1.The amount of light to residents flats will be reduced.
2.The podium and children's playground which is an escape for the residents will also lose natural daylight.
3.The noise of the construction will affect the daily lives of the elderly and those working from home who spend the majority of their time at home.
4.The introduction of a skyscraper so close to the estate may open the floodgates for other buildings close to the estate to be developed.

Therefore I suggest that skyscrapers should be confined to areas like Bishopsgate and Leadenhall Street where there are NO residential estates.

Yours sincerely,

Ian Hartog

From:	Julian Bailey
To:	PLN - Comments
Subject:	Objection to the proposed Skyscraper development ref 21/00622/FULEIA
Date:	30 August 2021 22:18:36

THIS IS AN EXTERNAL EMAIL

FAO: Mr Liam Hart

I am writing to object to proposals for the high-rise skyscraper development at 115 - 123 Houndsditch London EC3A 7BU, which has boundaries on Houndsditch and Cutler Street.

The proposed height and mass of the new building will have a detrimental effect on all those that live on the Middlesex Street Estate due to loss of light in flats, the recreational area on the estate podium, plus to the roof areas that are due to have solar panels installed. The sheer scale and mass of the proposal is an encroachment onto a residential area, that has been allowed to happen over the last 20+ years.

Whilst I believe that I can't object to a loss of view, I own a flat whose outlook (visual amenity) has been transformed out of all recognition with ever increasing skyscrapers, that are taller, bulkier, and getting closer all the time. The outlook is being transformed from sky to a mass of metal and glass buildings taking away blue sky. Our residential buildings and hence also my flat in Petticoat Tower is being overwhelmed by these buildings and these new proposals, if allowed, will make it feel more oppressive to live in this area and have a detrimental effect on people's health and wellbeing.

I attach a few photos to highlight the view from my window - rather than naming all the new ones I will name the ones that were present and of a significant size (for then) when I moved into my flat in 1998 : the NatWest Tower - Tower 42 (no longer visible) and the Lloyds Building (now barely visible). We used to be able to see the Monument! I know that things progress but my objection is how close these new proposals are to a City of London residential estate; that the height and scale is out of proportion to neighbouring buildings such as Devonshire Square, Premier Place and 133 Houndsditch and St Botolph's Building.

https://photos.app.goo.gl/uLGKAY4w5mzuPkJP9

3 new photos by Julian Bailey

photos.app.goo.gl

The first photo is looking from MSE towards Cutler street - you can see the Heron Tower, the Can of Ham and Premier Place. Premier Place is further from the estate and is lower than the proposals; the proposals should at the very least be lower than Premier Place, as the proposed development is closer the estate and will have more

impact.
The second photo looks straight from my flat and shows St Botolph's House to the left, again a much lower building than these massive proposals.
The third photo, again straight from my flat, shows how many skyscrapers have been allowed to occur over a period of time and how they are gradually encroaching on the estate and eating away the sky.

My further concern is that by allowing planning for this massive building to go ahead, it will set a precedent for other buildings such as 133 Houndsditch (Five Acres Square) to be developed which will completely block out any sky / light from the Estate. It is noted that the plans show a windowless wall facing this site which indicates that this has been done to enable this to happen.

Loss of light: I have a one-bedroom flat whose only lounge window on that side is a small rectangular window. Any loss of light will have a severe effect as these windows are so small in the first place. As mentioned above, there will be a loss of light to the podium area which is a communal space; plus, loss of light on roofs; and loss of light for businesses who use Harrow Place pavements for business.

Light pollution - we are already affected by light pollution from office buildings - having such a large development next to the estate will create even more pollution.

Construction noise and pollution - having endured the noise and pollution from the demolition and building of St Botolph's House and the Travelodge, I know the complete disruption of normal life that occurs when these developments go ahead. We have been advised it will take 5 years. How are people expected to live / work from home, study from home during this period? It will make it impossible to rent my property during this period, and impossible to sell it.

Monetary loss - If the development is allowed to go ahead, in any form, this is going to have a detrimental effect on all who live here, but in addition to that, it will have a detrimental monetary effect on owners through loss of rent/ inability to sell during ongoing work period and afterwards due to being blocked in by a huge building. Owners require compensation for these monetary losses.

Finally, I believe that the proposals are looking to remove the thoroughfare of Clothier Street - I object to that being allowed to happen

In summary, I object to:

1. The height and mass of the proposal
2. Loss of light
3. Light Pollution
4. Noise and pollution during demolition and construction
5. Monetary loss incurred by leaseholders during demolition, construction and long-term impact on sale price after completion of proposed plan.
6. Loss of Clothier Street as a throughfare

I trust that you will consider the harm the proposal in its current form would inflict on the residents, leaseholders and others and refuse this planning permission in it's current form,

Kind regards

Julian Bailey
13C Petticoat Tower

London E1 7EE

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-

Comments for Planning Application 21/00622/FULEIA

Application Summary

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Case Officer: Liam Hart

Customer Details

Name: Ms Lisa Hollick
Address: 221 Petticoat Sq LONDON

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The construction will block out light from the podium on the estate - Sunlight and our gardens are important for the mental health of all the residents.

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details

Name: Miss Liz Woolcock
Address: 612 Petticoat Square (Harrow Place/Middlesex Street Junction) London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:** please note that due to my disability and no access to email or internet I have given my personal authority to my neighbour Ray Ruzzaman of 603 Petticoat Square to submit my comments quoted below on my behalf) **

.

The proposed skyscraper building is too high and will interfere and cause the loss of the natural day and sunlight directly into my property and the residents podium area that I have enjoyed continuously for 25+ years.

.

Thank You
Liz Woolcock

From: Martha Perez Ruiz
To: PLN - Comments
Subject: Objection to the proposed Skyscraper development ref 21/00622/FULEIA
Date: 30 August 2021 22:24:26

THIS IS AN EXTERNAL EMAIL

FAO: Mr Liam Hart

I am writing to object to proposals for the high-rise skyscraper development at 115 - 123 Houndsditch London EC3A 7BU, which has boundaries on Houndsditch and Cutler Street.

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Whilst I believe that I can't object to a loss of view, I own a flat whose outlook (visual amenity) has been transformed out of all recognition with ever increasing skyscrapers, that are taller, bulkier, and getting closer all the time. The outlook is being transformed from sky to a mass of metal and glass buildings taking away blue sky. Our residential buildings and hence also my flat in Petticoat Tower is being overwhelmed by these buildings and these new proposals, if allowed, will make it feel more oppressive to live in this area and have a detrimental effect on people's health and wellbeing.

I attach a few photos to highlight the view from my window - rather than naming all the new ones I will name the ones that were present and of a significant size (for then) when I moved into my flat in 1998 : the NatWest Tower - Tower 42 (no longer visible) and the Lloyds Building (now barely visible). We used to be able to see the Monument! I know that things progress but my objection is how close these new proposals are to a City of London residential estate; that the height and scale is out of proportion to neighbouring buildings such as Devonshire Square, Premier Place and 133 Houndsditch and St Botolph's Building.

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3 new photos by Julian Bailey

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Premier Place, as the proposed development is closer the estate and will have more impact.
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My further concern is that by allowing planning for this massive building to go ahead, it will set a precedent for other buildings such as 133 Houndsditch (Five Acres Square) to be developed which will completely block out any sky / light from the Estate. It is noted that the plans show a windowless wall facing this site which indicates that this has been done to enable this to happen.

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Finally, I believe that the proposals are looking to remove the thoroughfare of Clothier Street - I object to that being allowed to happen

In summary, I object to:

1. The height and mass of the proposal
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3. Light Pollution
4. Noise and pollution during demolition and construction
5. Monetary loss incurred by leaseholders during demolition, construction and long-term impact on sale price after completion of proposed plan.
6. Loss of Clothier Street as a thoroughfare

I trust that you will consider the harm the proposal in its current form would inflict on the residents, leaseholders and others and refuse this planning permission in it's current form,

Kind regards

Martha Perez Ruiz
13C Petticoat Tower
London E1 7EE

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-

Comments for Planning Application 21/00622/FULEIA

Application Summary
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Case Officer: Liam Hart

Customer Details
Name: Mrs Philomena Levy
Address: 208 Petticoat Square Middlesex St London

Comment Details
Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I wish to object to this proposal.

We have not been consulted about this.

The light will be cut .

The noise level will be tremendous in addition to the noise from the bottle clearance site, and the noise from the cafes and the increase in traffic.

May I remind you that the podium level has not got proper noise insulation like the rest of the estate.

I await your considered reply.

P Levy 208 Petticoat Square.

Comments for Planning Application 21/00622/FULEIA

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Case Officer: Liam Hart

Customer Details

Name: Mr Ray Ruzzaman
Address: 603 Petticoat Square (HARROW PLACE) London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:
LIGHT
The proposed building will cause a great loss of existing day and sunlight into my 6th-Top-Floor Petticoat Square (PSQ) Harrow Place property which I have enjoyed since 1996 (26 years), totally unacceptable. The 601 > 633 PSQ studio properties do not have a large/main window at the front , I have shared photographs with the developer both on the external and inside of my property - email "12 August 2021 at 20:31:16 to cutlerstreetfuture@kandaconsulting.co.uk - FAO Liam", NOT EVEN ACKNOWLEDGED, who seemed taken aback when mentioned we had no main/large window to front of the studio properties on Harrow Place, I now assume their loss of light analysis for 6th floor PSQ, particularly on the Harrow Place side, were undertaken without the knowledge of there being no main/large window at the front of the 6th Floor Harrow Place properties and be inaccurate ? This piece of legislation outlines the rights of any 20+ year resident effected by this new building proposal - https://www.legislation.gov.uk/ukpga/Will4/2-3/71/section/3
.

HIEGHT

The existing proposal is far to high, will cause great effect to day and sunlight into all the properties and communal podium area of the estate. Given this effect, in addition to society now moving into a new long term Working From Home culture, it will add to residents existing utility costs as for the need to lighten and brighten up the inside of their property during day/sunlight hours and heating costs to keep warm during the colder months, totally unacceptable.

.

HEIGHT AND EXISTING NEIGHBOURING OFFICE DEVELOPMENT

Should the proposed new Cutler Court development go ahead, it's blank wall clearly indicates the right for its neighbour to go just as high, should that site be redeveloped in the (near?) future, that would cause a near blackout of day & sunlight into properties of the estate and onto the communal podium area, totally unacceptable.

.

ESTATE COMMERCIAL UNITS

The building will effect the day and sunlight already received onto Harrow Place commercial units and the alfresco dinning experience it offers it's customers, totally unacceptable.

.

CLOTHIER STREET

It seems the City of London (CoL) is, shockingly, happy "to give away" this historical thoroughfare, totally unacceptable.

Comments for Planning Application 21/00622/FULEIA

Application Summary
Application Number: 21/00622/FULEIA
Address: 115 - 123 Houndsditch London EC3A 7BU
Proposal: Demolition of existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), flexible retail / cafe use (Class E); community space (Sui Generis), ancillary basement cycle parking, servicing and plant; new public realm and highway works; and other works associated with the development. |cr|(The proposed development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of flexible retail / cafe floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; Total floorspace 66,867 sq.m; Overall Height 116.995m AOD).|cr|(The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.)
Case Officer: Liam Hart

Customer Details
Name: Ms Silvia Montoto
Address: 440 petticoat square middlesex street LONDON

Comment Details
Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
Comment:Dear Sirs

I'd like to express my objection to this application on the grounds that if it was approved it would result in a considerable reduction in the daylight of our courtyard and in the flats in our state. The building already under construction at the lower end of Middlesex street will block the view of the sky and reduce daylight. The approval of the current project would result in our state being surrounded by several high rise buildings which would have a significant impact in the amount of daylight

From: LJ
To: PLN - Comments
Subject: Comments for Planning Application 21/00622/FULEIA
Date: 05 October 2021 14:08:22

THIS IS AN EXTERNAL EMAIL

I object to the referenced planning application for the following reasons:

1. Environmental
   All attempts should be made to restore and retain before demolition and replacement on the basis of both the energy consumption and the polluting involved in both the demolition and the new build. This is even more disturbing in a climate that encourages overbuilding, and the existing oversupply of office space in the City of London.

2. Adding to the Over Supply of Office Space
   At present there is an over supply of office space in the City of London and there is likely to be for some time. So there is no justification for permitting further construction, particularly of high rise buildings that compromise the lives of those living in the city by reducing amenity. Most of the current construction projects are vanity projects for rich (often foreign and/or criminal) elements of society pursuing an upmarket equivalent of the male 'pissing competition'. Of course, underneath it all is the City of London pursuing more revenue, though for what is questionable, because it certainly isn't spent on the residents.

3. Loss of Light
   The proposed building will affect the amenity of the residents living on the Middlesex Street Estate. The amount of light reaching the estate will be reduced which could, in addition to making the living environment less pleasant for all, mean that parts of the MSE worst affected may face increased problems with damp and dark conditions.

4. Noise, pollution and general disruption.
   The MSE has had constant disruption caused by buildings being constructed in its vicinity. The noise is almost continuous 8am – 6pm, and work often extends in to Saturday. With construction comes dust, and pollution in general, as large vehicles bring building materials to building sites. This unnecessary building will perpetuate the reduction of living conditions for residents.

5. Health
   Adequate light is necessary for good health, particularly for children. We don't want to return to a situation where children are at risk of Victorian diseases like rickets, but living in an overshadowed estate and with few local open spaces, that is what could happen. The pollution from construction will affect those with respiratory diseases, particularly the elderly. There are no positives for the health of residents in this proposed development.

6. The Bevis Marks Synagogue
   The proposed building will have a very negative effect on the Bevis Marks synagogue from both a religious and an historical perspective. Allowing this to happen is inexcusable.

7. Proposed Open Space

   There is nothing that supports the building of another superfluous office block that would have such a substantial negative effect on the residents and the surrounding environment. The promised open space is just another unfriendly concrete space and we already have plenty of them already, and I don't see anyone picnicking in them at the weekend. We need grassed spaces not more concrete.

And finally an alternative suggestion.

I would support the demolition of the existing building provided the entire space it occupies is converted into a public garden, not a concrete garden.

Lana Joyce
Flat 17A
Petticoat Tower
E 1 7EF

Comments for Planning Application 21/00622/FULEIA

Application Summary

Application Number: 21/00622/FULEIA
Address: 115 - 123 Houndsditch London EC3A 7BU
Proposal: Demolition of existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), flexible retail / cafe use (Class E); community space (Sui Generis), ancillary basement cycle parking, servicing and plant; new public realm and highway works; and other works associated with the development. |cr||cr|*RECONSULTATION: Supplementary information regarding daylight to properties in the Middlesex Street Estate and sunlight to the podium level amenity space in the Middlesex Street Estate*. |cr||cr|(The proposed development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of flexible retail / cafe floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; Total floorspace 66,867 sq.m; Overall Height 116.995m AOD).|cr||cr|(The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.)
Case Officer: Liam Hart

Customer Details

Name: Miss Anna Godefroy
Address: Urban Growth International House, 6 Canterbury Crescent london

Comment Details

Commenter Type: Other
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:At Urban Growth we believe that this plan would work very well within the community it serves. Indeed, it includes a new hub for green initiatives, such as local gardening opportunities and landscaping services. This plan helps in providing more green facilities and opportunities within the hyper-urban City of London, which is more important than ever.

A new community space as such would allow to initiate more green initiatives, and it would be great for this area and the City of London as a whole.

From: Evans, Catherine
To: PLN - Comments
Cc: Stothard, Gideon
Subject: 21/00622/FULEIA
Date: 27 October 2021 12:32:51
Attachments: image0.png

Please could this objection be uploaded to 21/00622/FULEIA.

Thanks,
Catherine

From: Justa thought [redacted]
Sent: Tuesday, October 26, 2021 9:57 pm
To: Moss, Alastair; Richards, Gwyn; Jones, Henry (Deputy)
Subject: Fwd: Draft

THIS IS AN EXTERNAL EMAIL

Dear Members,

Re; 115-123 Houndsditch London EC3A 7BU

According to the planning application documents submitted it appears the City of London has given consent to a private developer to acquire free of charge a valuable public asset, a public highway , namely Clothier Street. I wish to object to the manner in which this decision was reached and to enquire how this disposal can be reversed for the following reasons;

1. Clothier Street is an ancient street with reference to it being connected to the rag trade going back to Elizabethan times. More recently, in the past 120 years it has appeared on various historical maps of the area. Please see screenshots of the maps below.

These ancient streets such as Clothier Street are part of the history and grain of the City of London and as such are held in trust in perpetuity for the citizens and commonality of the City of London Corporation. Rather than disposing of our street name history I would point you to a recent example of where Artizan Street was lost/ closed between 1972-2018, was restored and reopened as a street thanks in part with the help of Deputy Henry Jones MBE who working with the local residents recovered the Artizan Street name. This in turn gave Artizan Street library it's name also. Middlesex estate previously was known as Artisans Dwellings as shown in the 1912 photo below. You can see from the various maps both Artizan Street and Clothier Street.

It has been suggested by the developer and others that by acquiring the valuable asset of Clothier Street to build on that some how the citizens are being compensated for their loss by the widening of the pavement. It seems to me a more proportionate way to address this would be to level the pavement and road such as has been done around the City, including Artizan Street.

From a purely commercial perspective Clothier Street is not only owned by the Corporation but also the land beneath it and the space above it. The developer intends to build four floors below Clothier Street

converting that currently publicly owned land into their private property. They are also proposing to build 23 floors above the ground on Clothier Street. Their cumulative development gain of 23 stories and 4 below would if spread out amount to the equivalent of an acre of land. How can the a few feet of pavement widening equate with giving away and acre of the most valuable and scarce land in the country?

The manner of any disposal of Clothier Street must be a matter of the utmost importance and one that should be brought to the Citizens and commonality of the City of London Corporation for their consideration.

I would like to ascertain the current status of the ownership of Cutler Street and indeed the names of any others who may have an interest in it including the Transport and Highways authority and those responsible for it's yellow markings and upkeep. Also I understand that there may be a market licence still in existence between one of the city guilds and the corporation.

Finally Cutler Street is also an ancient right of way that has been enjoyed by residents from our estate, including myself, and as such we would like to explore our rights under the existing legislation before this right of way can be extinguished.

Finally I would point out that it has for a long time been a planning requirement that all new tall buildings must include new pedestrian routes through the proposed development. Alister Moss , the Chair of the Planning and Transportation Committee reiterated this when he commented that this requirement would be continued in the City Plan 2036.

I look forward to receiving a reply to my queries above and am available to discuss this by phone should clarification on any of the points above be needed .

Regards

Damien
[redacted]

21:09 Thu 19 Aug

skyscrapercity.com

57%

Figure 2 Site Boundary



01:13 Sat 18 Sep

thestreetnames.com

73%

A marginally less tenuous Welsh connection comes with **Clothier Street** near Houndsditch. It has a connection to the rag trade that goes back to Elizabethan times when it was famous as a gathering area for sellers of old apparel. An official Clothes Exchange was established there in 1875 and the current name was assigned in 1906.



In 2008 Prince Charles, Prince of Wales honoured a debt with the Clothiers Company of Worcester incurred by Charles II in 1651. Prior to the Battle of Worcester in 1651, Charles II commissioned the Clothiers Company to make uniforms for his troops, and promised to pay after winning the battle. However, Cromwell won and Charles fled to Europe, leaving a debt of £453.3s which he did not settle after he acceded to the throne.

The Prince of Wales personally repaid the sum of £453.15 as a gesture of goodwill during a visit to The Commandery, which served as the Headquarters for the Royalists during the battle.

In Covent Garden, **Orange Street** could be named after William III, William of Orange and grandson of Charles I, who became joint

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1900 map of Jewish East London. Circled on the left of the map is the location of the Houndsditch murders; circled on the right is the location of 100 Sidney Street. The map is coloured to show the density of Jewish residents in East London: the darker the blue, the higher the Jewish population.[a]

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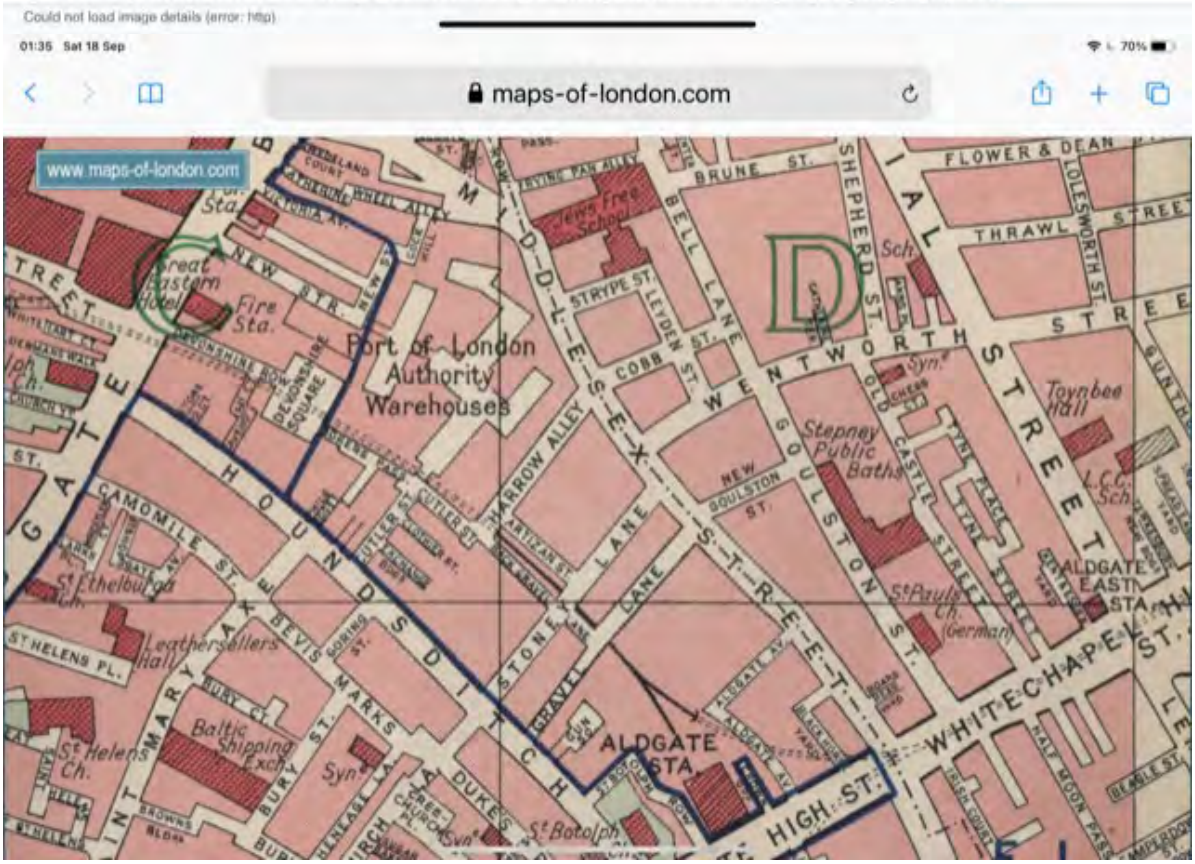

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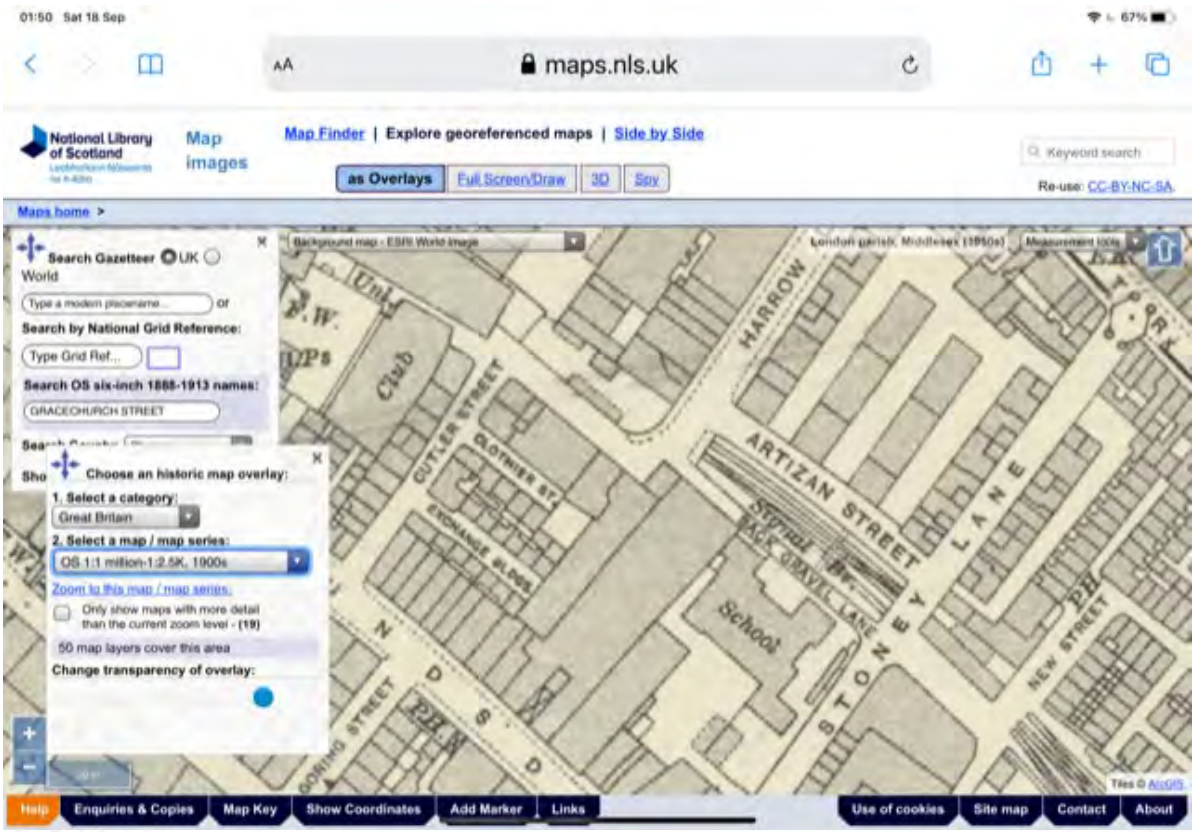
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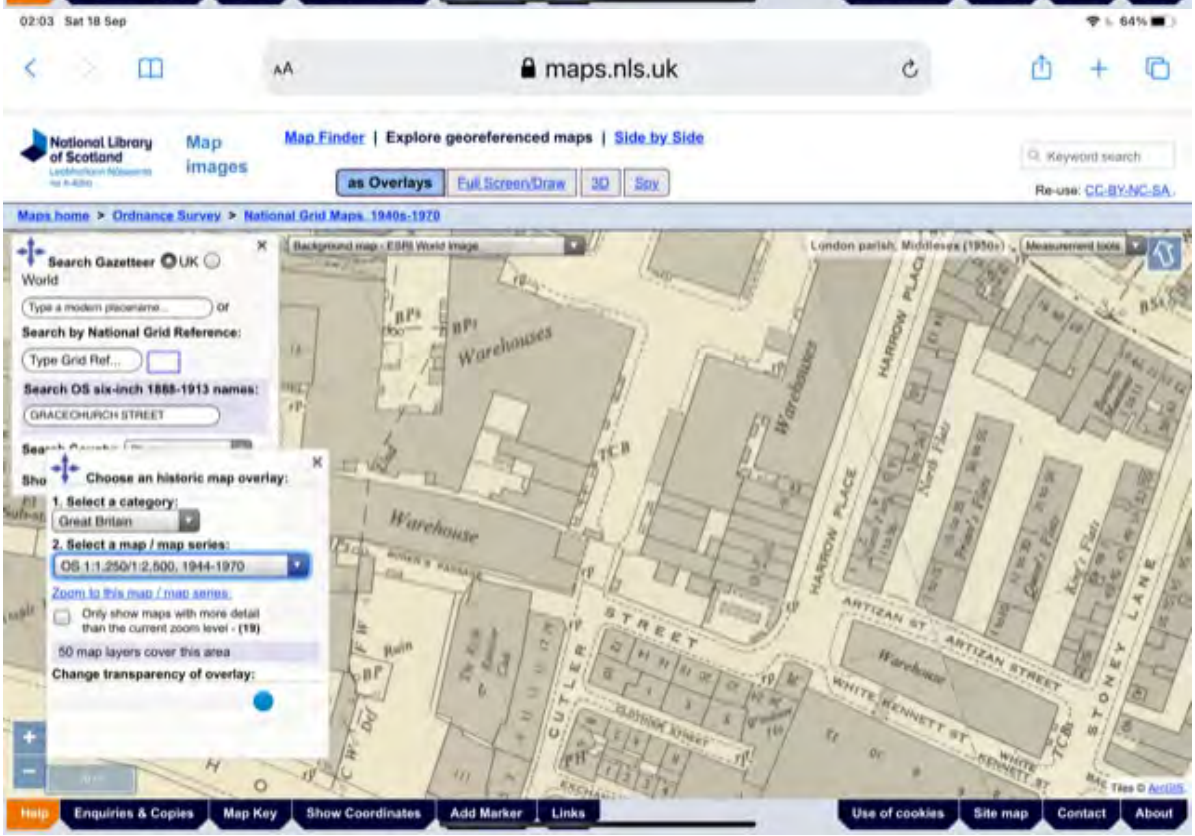
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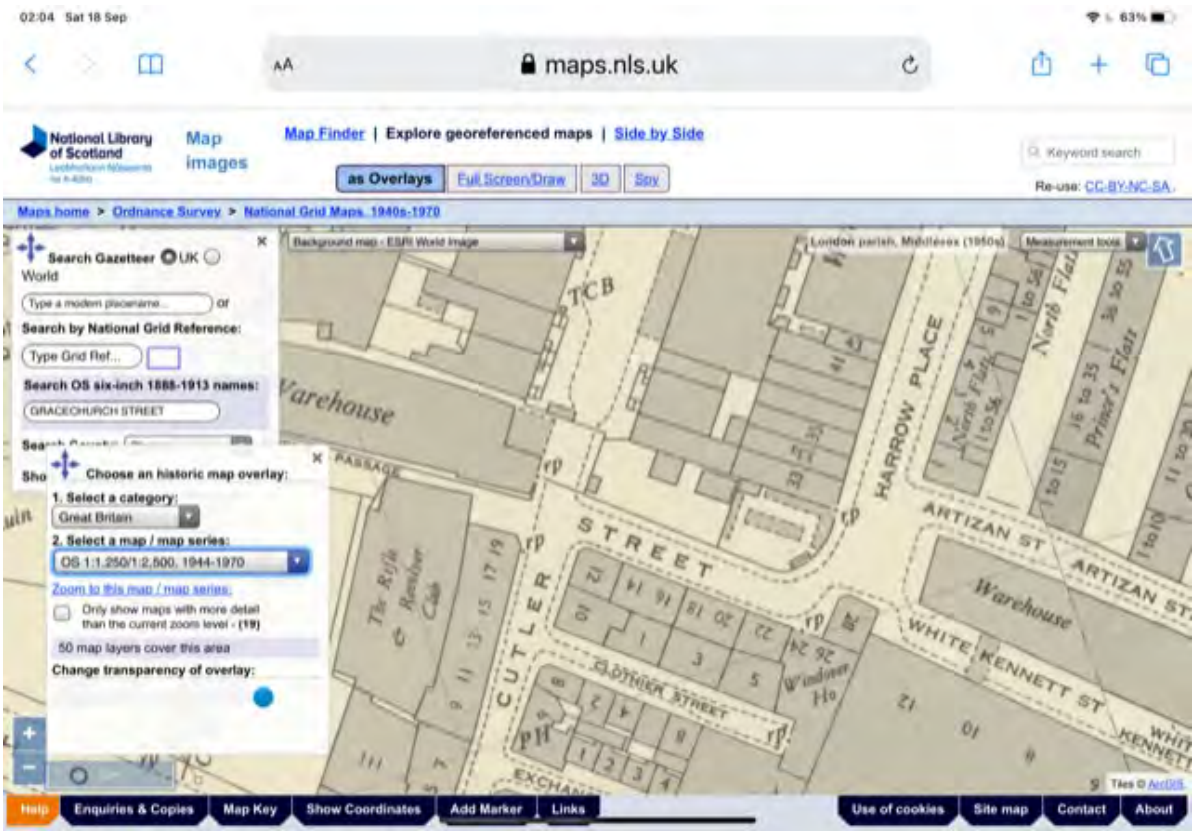
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From:	Stothard, Gideon
To:	Devlia, Neel
Cc:	Evans, Catherine
Subject:	FW: Cutler St Development: Daylight reduction to flats on MSE
Date:	05 November 2021 14:28:07

From: Vicky Stewart [redacted]
Sent: 28 October 2021 14:07
To: Hart, Liam <Liam.Hart@cityoflondon.gov.uk>
Cc: Gelleh, Hibaaq <Hibaaq.Gelleh@cityoflondon.gov.uk>; Roger Way [redacted]
Subject: Cutler St Development: Daylight reduction to flats on MSE

THIS IS AN EXTERNAL EMAIL

Copied to Hibaaq Gelleh and Roger Way, Chair of Middlesex St Residents Association

Dear Liam

I have spoken to the development team of the Cutler Street/ Houndsditch project about my concerns for the loss of light to my flat and other flats on the Middlesex St Estate.

My flat will lose 10.2% light. On querying this I was told this falls within the maximum permitted loss of 20% per dwelling.

This prompts my query to you - is loss of light accumulative?

I have already lost light from the construction of Beaufort House, The St Botolph Building, One Creechurch Place, The Scalpel, The Gherkin, The Can of Ham and Twenty Two Bishopsgate. Surely, the Cutler St Development will take us well over the 20% threshold.

Looking forward - the site alongside Cutler St will be the next proposal and that will impact us hugely - so will the threshold still be 20% light loss then?

At this rate, in the future, no light to residences will eventually be permitted!

I welcome your urgent response.

Vicky Stewart
10c Petticoat Tower

From:	sandra mcbean
To:	PLN - Comments
Subject:	Reference number 21/00622/FULEIA Case Officer: Liam Hart
Date:	04 November 2021 13:56:27

THIS IS AN EXTERNAL EMAIL

Dear Mr. Liam Hart,

It is anticipated that this project will be another high-rise structure, thus decreasing natural light for a large number of flats on the Middlesex Street Estate in the coming years. A reduction in the amount of natural light reaching apartments on the Middlesex Street Estate would have negative repercussions for residents. The result is that residents' energy costs will rise as they are compelled to use more power to light their houses, which will have a negative effect on the environment as well as their wallets.

Natural light is extremely important, and a lack of exposure can result in a variety of health problems. Natural light helps our bodies produce Vitamin D, improves our circadian rhythms and sleep patterns, improves our ability to concentrate, allows us to accomplish more, and even improves our overall happiness. Maintaining adequate levels of this essential resource is essential for our bodily and psychological well-being.

How many more high-rise buildings are going to be constructed until all of the inhabitants of Middlesex Street Estate are forced to rely on artificial lighting all of the time? Because it is undeniable that artificial lighting will never be able to completely replace natural light emitted by the sun.

Furthermore, the northern hemisphere will be tilted away from the sun throughout the Autumn/Winter months, causing the sun to come in at an angle and seem lower in the sky. This means that during certain months after the sun is positioned behind the Gherkin, no more sunlight will be able to reach the west side of the structure. I had attached some pictures to demonstrate this. Hours between 11:00 am to 16:00 pm.

Once again, I am in opposition to a proposal that would have a severe influence on the lives of the inhabitants of Middlesex Street Estate and their families.

Yours faithfully,

Ms. Sandra Mc Bean Ruiz

Resident and leaseholder,
8d Petticoat Tower
Middlesex Street Estate














02/11/2021

Committee(s)	**Dated:**
Planning and Transportation Committee [for decision] Policy and Resources Committee [for decision]	16/11/21 18/11/21
Subject: **Riverside Strategy for adoption**	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,11,12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of: Juliemma McLoughlin / Gordon Roy Executive Director Environment / District Surveyor and Environmental Resilience Director	For Decision
Report author: Tim Munday & Janet Laban Environmental Resilience Team	

Summary

This report seeks Member approval for adoption of the City of London Riverside Strategy 2021. This follows redrafting of the strategy to take account of responses to the public consultation (July/Aug 2021). Several non-material changes have been made to the draft strategy to strengthen the approach to biodiversity and accessibility and to promote the need for best practice engineering solutions when flood defences are raised.

This City Riverside Strategy provides a roadmap to guide the City of London Corporation as Local Authority and Lead Local Flood Authority (LLFA) for the Square Mile. Our aim is to ensure that the City remains at low risk of flooding throughout this century and beyond, taking account of the predicted changes in sea level rise because of climate change. The options set out in this strategy align with the Climate Action Strategy's goal that the Square Mile's buildings, public spaces and infrastructure are resilient to climate change. The strategy will be reviewed at least every 10 years in the light of new evidence and may change in the future.

Recommendation(s)

i) Members of Planning and Transportation Committee are asked to:

- Recommend for onwards approval to the Policy and Resource Committee, the text of the draft Riverside Strategy for adoption, subject to the incorporation of any changes proposed by this Committee.

ii) Members of the Policy and Resources Committee are asked to:

- Approve the text of the draft Riverside Strategy for adoption.

Main Report

Background

1. The Environment Agency led Thames Estuary 2100 Plan (TE2100) identifies actions that will need to be taken during this century to protect the land adjacent to the tidal Thames from fluvial flood risk. This area, including parts of the City, is protected from severe tidal flooding by the Thames Barrier and the other estuary defences. However, climate change impacts such as sea level rise and the prevalence of more extreme weather events mean that additional local and estuary-wide protection will be needed later this century.
2. Within the City the TE2100 plan identifies the need to raise flood defences to 5.85m AOD (above ordinance datum) by 2065 and 6.35m AOD by 2100. For the City's riverside this means raising parts of the flood defence by up to 1m although some sections are already at the required level for 2100. (see Riverside Strategy appendix 1 *Where are we now*). Through the TE2100 ten -year review it is looking increasingly likely that these dates will be brought forward since sea level rise is accelerating faster than anticipated.
3. This defence raising will have an impact on riverfront structures and walkways, on views of the river from the riverside walk and from nearby buildings. These impacts will need to be managed in a way that integrates the raised defences with the wider riverside environs. It also presents opportunities to enhance the user experience of the riverside, improve opportunities for biodiversity and highlight the historic importance of the City's riverside. Planning now will enable the most cost-effective options to be implemented in a pro- active way, thus maximizing the potential opportunities associated with programmed works.
4. The Environmental Resilience team in the Environment Department has developed this riverside strategy to interpret the TE2100 plan at a local level. The development of this riverside strategy fulfils part of the statutory Local Flood Risk Management Strategy (LFRMS) 2021-27 as approved by Planning & Transportation (P&T) committee on 16th February 2021. The strategy also aligns with the Climate Action Strategy's goals that the City Corporation and its assets and the Square Mile's buildings, public spaces and infrastructure are resilient to climate change.
5. The draft Riverside Strategy was approved for public consultation at the P&T Committee on 29th June 2021. Responses from this consultation have been considered in drafting the final Riverside Strategy for adoption, which will provide a roadmap to guide the City of London Corporation as Local Authority and Lead Local Flood Authority (LLFA) for the Square Mile. Our aim is to ensure that the City remains at low risk of flooding throughout this century and beyond, taking account of the predicted changes in sea level rise as a result of climate change.

The options set out in this strategy will be reviewed at least every 10 years in the light of new evidence and may change in the future

Current Position

6. The public consultation took place from 5th July to 16th August 2021 and was advertised through the website, the press, social media channels and through letters sent to riverside building owners. A 'StoryMap' introduction to the strategy was developed for the public consultation, this received over 1500 views on the City Corporation's website during the consultation period. Officers also presented the consultation at several industry groups and events.

7. There were seventy-one responses from eleven organisations and eight individuals. This included many of the statutory bodies with an interest in the Thames including the Environment Agency (EA), Port of London Authority (PLA), Marine Management (MMO), Thames Water, Transport for London and Historic England. Responses were also received from the planning divisions of the London Borough of Tower Hamlets and the London Borough of Hammersmith and Fulham.

8. Most respondents expressed support for the proposed strategy. Several felt that further clarification was needed in relation to the biodiversity strategy point, the opportunity works brought to improving river use facilities and highlighting the need for step free access to apply beyond the riverside walkway.

9. In summary the following changes were made in response to the public consultation:

    - Historic flooding – new paragraph 3.3 has been added on the history of the flood defence to complement the general background of the riverside.
    - Increased Lead Time - Figure 2 and SP5 – change of lead time from five to ten years. This change was advised the Environment Agency.
    - Accessibility to riverside facilities – SP7, SP8, SP12 – To highlight that accessibility applies to jetties, piers, stairs, and other features as well as the riverside walk.
    - Maintaining Thames Path access during construction – SP7 (5.21) where practicable
    - Access to River egress points – SP9 – clarifying that the egress points (ladders stairs etc.) need to be both retained and extended up so that they remain usable.
    - Biodiversity– SP10 – the policy has been amended to highlight the range of aquatic and land-based opportunities, the importance of habitats and biodiversity net gain.
    - Riparian facilities and impact of raising – SP12 – The need to maintain a functional interface with riparian facilities such as wharves, piers and future infrastructure has been added.
    - Surface water flooding – SP14 – The need to take account of surface water drainage arrangements when designing raised flood defences is highlighted in the text.
    - Lighting – SP15 – Highlighted that lighting will need to account for impacts to ecology and navigation.

    A full consultation report is available on request.

10. The consultation draft included appendix 2 which illustrated possible options for flood defence raising. This has been removed from the adoption version but

remains available within the Arcadis report City of London Riverside Survey (Oct 2020). Inclusion within the strategy gives the impression that we have identified predetermined solutions, whereas the strategy aims to encourage best practice engineering solutions at the time of raising.

11. The draft strategy has been amended to take account of consultation responses and the revised Riverside Strategy for adoption is included at appendix A

Options

12. The main alternative option to adopting the City's Riverside Strategy would be to challenge the TE2100 Plan through their public consultation in early 2022. The City Corporation's Local Plan 2015, draft City Plan 2036 and Local Flood Risk Management Strategy 2021-27 all support the TE2100 Plan. Both the adopted 2015 Local Plan and the draft City Plan refer to the need for flood defence raising and require new development along the City's riverside to be designed to enable future flood defence raising, noting the responsibility of riparian owners for the maintenance and enhancement of flood defences.
13. The preferred option is to adopt and begin implementation of the City's Riverside Strategy sharing our learning from this with other riparian LLFAs providing protection for the whole Thames Estuary to 2100 and beyond. As LLFA we believe that the TE2100 Plan provides the best option for protection of the whole Thames Estuary. A more appropriate response to the TE2100 review public consultation would be to challenge the funding mechanism for implementation and explore other options for funding.

Proposals

14. That Members approve the adoption of the text of draft Riverside Strategy. Following agreement, the Environmental Resilience Team will develop a final document with photos and illustrations to accompany the text. The Riverside Strategy will provide the basis for the adaptation of the City's Riverside to address the climate change impacts of sea level rise.

Key Data

15. Appendix 1 *Where are we now* to the Riverside Strategy provides maps and data relating to the City's riverside.

Corporate & Strategic Implications

16. **Strategic implications** – this strategy aligns with the following Corporate Plan objectives:
    (1) People are safe and feel safe
    (11) We have clean air, land and water and a thriving and sustainable natural environment
    (12) Our spaces are secure, resilient and well maintained
17. The Riverside Strategy fulfils statutory duties agreed through the City's Local Flood Risk Management Strategy 2021-27 and goals set out in the Climate Action Strategy 2020-

27. It also aligns with the Local Plan 2015 and draft City Plan 2036 which supports the Thames Estuary 2100 Plan for addressing flood risk from the tidal Thames

18. **Financial implications** Alongside other riparian owners the City Corporation and Bridge House Estates as riparian owners will need to address flood defence raising for the sections that they own. This strategy provides a cost-effective approach which enables this to be integrated into development and maintenance wherever possible enhancing the amenity and biodiversity value of the adjacent riverside.
19. **Resource implications** Implementation of this strategy in the early years will be integrated into planned works and therefore will not incur any additional resources
20. **Legal implications** The City Corporation as Lead Local Flood Authority has a statutory duty to develop a Local Flood Risk Management Strategy (LFRMS) for its area. The City Corporation's LFRMS was adopted in January 2021 and commits to the preparation of a Riverside Strategy which will drive forward the requirements of the Thames Estuary 2100 Plan. The adoption and implementation of this riverside strategy will assist in fulfilling this commitment. The Riverside Strategy also aligns with policy in the statutory Local Plan and emerging City Plan 2036.
21. **Risk Implications** Climate projections predict sea level rise that will affect the tidal Thames. Without a forward-looking strategy to deal with this the Square Mile and surrounding riparian boroughs will be susceptible to tidal flooding. This risk will be managed most cost effectively through a strategic approach which avoids structural and reputational damage from flooding and pre-empts the need for urgent measures as sea level rise accelerates.
22. **Equalities implications** An Equalities Test of Relevance and Strategic Environmental Assessment was undertaken on the draft strategy and are available on request. Post consultation clarifications have been considered in this context and found to have only a positive impact.
23. **Climate implications** This Strategy looks to address one of the main impacts of a changing climate on the City: sea level rise. The City Corporation's Climate Action Strategy includes goals for the City Corporation, its assets and the Square Mile to be resilient to climate change. This Strategy provides a key approach to implement this resilience whilst realising a range of co-benefits for the City's riverside. This pioneering approach will provide a blueprint for other riparian authorities reducing climate threats from sea level rise across the Thames Estuary
24. **Security implications** – none.

Conclusion

25. The City of London Riverside Strategy 2021 provides a forward-looking approach to adaptation of the City's riverside for the changes that are expected from climate change. This approach enables resilience to be integrated into planned works whilst enhancing the riverside environment for people and biodiversity. Members are asked to approve this strategy for adoption, implementation, and dissemination to other riparian authorities, to help prevent flooding along the Thames Estuary.

Appendices

- Appendix A – Draft Riverside Strategy for Adoption including appendix 1 *Where are we now*

Background Papers

Planning & Transportation Committee Report: Riverside Strategy for public Consultation 29/06/2021
Planning & Transportation Committee Report: local Flood Risk Management Strategy 2021-27 16/02/2021

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Appendix A: Draft City of London Riverside Strategy for Adoption

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Appendix A - City of London Riverside Strategy Committee Adoption version – November 2021

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1. Introduction

1.1. The City of London and the wider capital has throughout the centuries benefited from its position on the River Thames. As a tidal river the need to defend against the highest of tides is well understood and the river's flood defences have long protected the Square Mile from flooding. Through this next century sea level rises and changes to the wider estuary defences are expected. There is a need to protect the City from tidal flooding which brings with it an opportunity to shape an outstanding riverside space.

1.2. The Thames Barrier forms an essential part of the flood defences for the estuary and currently protects central London (including the City) from flooding. Closure of the barrier is becoming more frequent but there is a limit to the number of times per year that the barrier can be closed without affecting the river's ecology, navigation and the maintenance regimes for the barrier itself.

1.3. The second major element of the City's flood protection is provided by a flood defence at the river's edge. This protects from fluvial waters when the barrier is raised and higher tides which do not require closure of the barrier. The Thames Estuary 2100 Plan (TE2100) considers a number of options for how to protect the estuary from sea level rise including a proposal for a replacement barrier later this century.

1.4. Most of the riverside is accessible to the public due to a long-term ambition to complete the entire riverside walk on the north bank of the Thames. The need to raise significant sections of the flood defence will affect users experience of the riverside walk and adjoining premises and must be planned in a pre-emptive way to avoid unnecessary costs and disruption.

1.5. This City Riverside Strategy provides a roadmap to guide the City of London Corporation as Lead Local Flood Authority (LLFA) and Local Planning Authority for the Square Mile. Our aim is to ensure that the City remains at low risk of flooding throughout this century and beyond, taking account of the predicted changes in sea level rise as a result of climate change. The strategy sets out how we plan to deliver the local flood defences that contribute to this overall aim. The options set out in this strategy will be reviewed at least every 10 years in the light of new evidence and may change in the future.

1.6. Successful implementation of this strategy in the coming decades will be dependent on suitable funding mechanisms being put in place. Options for funding should be a key consideration during the early stages of the strategy.

2. Our Vision

2.1. The City Corporation is dedicated to shaping an outstanding riverside environment, protecting and supporting a flourishing society and a thriving economy fit for the coming century.

2.2. In its role as Lead Local Flood Authority, the City Corporation will progress this vision through a strategy that uses the opportunities brought about by the need

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to raise our river flood defences to overcome challenges and ensure benefits to the people who live, work, learn and visit the Square Mile.

2.3. The following are the long-term goals of the strategy, balancing these will be key to its success and will guide future decisions for the riverside:

- To ensure continued flood protection to the end of the century and beyond by raising the defences and improving future maintenance.
- To maintain and improve pedestrian access along the entire length of the riverside.
- To protect and enhance our historic riverside assets.
- To promote the safe use of the river and riverside as a vibrant place to be for health and wellbeing.
- To increase the value of the riverside for natural capital and ecology.
- To safeguard protected and valued views.
- To maintain appropriate land use adjacent to the river.

2.4. This strategy and the wider TE2100 Plan will have implications for the City Corporation and Bridge House Estates as a riparian property owner. The full implications for the City Corporation's riparian properties within and outside the Square Mile will require further investigation. This strategy will be reviewed at least every 10 years in line with the TE2100 Plan and may be revised at any time in the light of new evidence that emerges.

3. Background

3.1. The River Thames flows through the City from its boundary with the City of Westminster to the west of Blackfriars Bridge, to its boundary with the London Borough of Tower Hamlets at the Tower of London. The river has a tidal range of seven metres twice per day, throughout this section. Along this stretch, one and a half miles of flood defences protects riverside properties and public realm at high tide. At low tide wide areas of foreshore are visible at several locations along the river within the City. The original natural state of the river has been modified and restricted with extensive land reclamation from the Roman Period and continual development of warehouse, quays, wharfs and jetties. Six bridges span the river within the City (Blackfriars road-bridge, Blackfriars railway-bridge, Millennium footbridge, Southwark Bridge, Cannon Street railway-bridge and London Bridge). The navigable river channel is used for a variety of vessels including barges towing waste and construction materials, river buses, leisure boats and river patrol boats. The ecology of the river has improved in the last 50 years and it is now designated as a Site of Metropolitan Importance for Nature Conservation (SMINC).

3.2. The historical development of the City is closely bound with its location on the Thames. The Roman settlement, established in the mid-1st Century grew rapidly, becoming the capital of Roman Britain and an important port. A permanent bridge is likely to have been in place by c52AD, at the most seaward point that

the river could be easily bridged. At this time the river was wider and shallower, and the riverbank was on the north side of modern Thames Street. The construction of successive waterfronts and land reclamation continued in the early medieval and later periods. The building and rebuilding of extensive wharves, docks, alleys and a network of narrow streets, linking the waterfront with the principal medieval markets at Cheapside and Eastcheap, underpinned the trading and commercial role of the City in the country and abroad. The significance of London meant that the Pool of London handled half the nation's trade by the end of the middle ages and was the world's busiest port in the eighteenth century. Construction of new, larger docks and expansion of the port to the east gradually diminished the importance of the City as a port, a trend that accelerated from the late 1940s onwards. Warehouse buildings and wharfs went out of use and many sites were redeveloped for offices and housing. A riverside walk was established, incorporated into new developments and eventually linking to form a continuous pedestrian route.

3.3. The significant contribution of the River Thames to the civic life of London and the development of its riverside has meant that throughout the centuries steps have been taken to manage flooding in this important area. Following the Great Fire of 1666, the Rebuilding of London Act stipulated that the riverside should be raised three foot to better prevent it from flooding. Further raising was undertaken following flooding in 1928. Other incidents of flooding including the North Sea Flood of 1953 led to the implementation of new flood control measures that culminated in the construction of the Thames Barrier.

3.4. A range of policies and strategies protect and shape the City's riverside (Table 1)

Table 1: Policies and strategies affecting the City's riverside

City of London	Greater London Authority	Other statutory bodies
Local Plan / City Plan 2036	The London Plan 2021	Environment Agency Thames Estuary 2100 Plan
	Implementation Report - Safeguarded Wharves Review 2018-2019	Dept for Housing Communities and local Government Wharves safeguarding direction Feb 2021
Thames Strategy SPD 2015	Mayor's River Action Plan 2013	Marine Management Organisation South-East Inshore Marine Plan June 2021
Transport Strategy 2019	Mayor's Transport Strategy 2018	
Climate Action Strategy 2020-27		
Local Flood Risk Management Strategy (LFRMS) 2021-27		

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Riverside Walk Enhancement Strategy 2014		
Waste Strategy 2014-2020 (Under review)		

3.5. The Environment Agency led TE2100 Plan identifies actions that will need to be taken during this century to protect the land adjacent to the tidal Thames from flood risk. This area, including parts of the City, is protected from severe tidal flooding by the Thames Barrier and the other estuary defences. However, climate change impacts such as sea level rise and the prevalence of more extreme weather events mean that additional local and estuary-wide protection will be needed later this century.

3.6. The primary function of the Thames Barrier is to prevent tidal flooding in London, and it is currently closed when water levels are forecast to overtop the river flood defences upstream of the Barrier. Water levels in the tidal Thames are increasing as a result of climate change resulting in more frequent barrier closures. A limit of 50 closures per year on average has been set to allow sufficient time for maintenance and navigation. Raising the statutory heights of local flood defences along the Thames will help to manage the frequency of barrier closures by allowing higher water levels to pass up the Thames thus maintaining the reliability of the existing barrier. As water levels increase further, a major upgrade or replacement of the Thames Barrier will be required to protect London in the future. These options are being considered in the TE2100 Plan.

3.7. Within the City the TE2100 plan identifies the need to raise flood defences to 5.85m AOD (above ordinance datum) by 2065 and 6.35m AOD by 2100. For the City's riverside this means raising parts of the flood defence by up to 1m although some sections are already at the required level for 2100. The adaptive pathways approach adopted in the TE2100 plan links the flood defence raising to sea level rise. Through the TE2100 ten -year review it is looking increasingly likely that these dates will be brought forward since sea level rise is accelerating faster than anticipated.

3.8. This defence raising will have an impact on riverfront structures and walkways, on views of the river from the riverside walk and from nearby buildings. These impacts will need to be managed in a way that integrates the raised defences with the wider riverside environs. It also presents opportunities to enhance the user experience of the riverside, improve opportunities for biodiversity and highlight the historic importance of the City's riverside. Planning now will enable the most cost-effective options to be implemented in a pro- active way, thus maximizing the potential opportunities associated with programmed works.

3.9. In the City riparian owners are responsible for maintaining their part of the flood defence which is usually associated with the legal ownership of a site on the landward side of the defence. Various licenses and permits are required before any work is undertaken on the riverside or flood defence structures. (Table 2) This

ensures that navigation, flood protection and natural capital are not compromised during or as a result of these works. Works may also need planning and listed building consents.

Table 2: Permits and Licenses that may be required for flood defence works

Organisation	License or permit required	Details
Port of London Authority (PLA)	River Works License	Any works in, on, over or under the river. This includes permanent works such as a new pier and any temporary works such as repairs to a river wall which requires access/ scaffolding
Environment Agency (EA)	Environmental Permit for Flood Risk Activity	Flood Risk Activities are activities in, under and over a main river and other activities that could affect flooding from a main river or sea which includes any works taking place within 16m of the landward extent of a tidal flood defence Including any below ground structures.
Marine Management Organisation (MMO)	Marine License	Activities within the UK marine area that occur below mean high water springs including construction dredging deposit or removal of any substance or object, incineration, scuttling (sinking) or use of explosives
City of London Corporation	Planning Approval and/or Listed Building Consent	Any works related to changes to a development site or a listed building or structure.
Historic England	Scheduled Monument Consent	Any works that will affect a scheduled monument, whether above or below ground.
Transport for London/Highway Authority	Highway Licenses	Any works that impact the highway.

3.9 The City Corporation's Climate Action Strategy (CAS) 2020- 2027 includes a strong focus on Climate Resilience against the six climate risks that the City faces:

- Flood risk
- Heat stress
- Water resources
- Natural capital
- Pests & diseases
- Food & trade

Implementation of this strategy will require an integrated approach so that solutions for each risk incorporate responses to other risks where possible. For example, measure to address flood risk on the City's riverside, should also incorporate greening to reduce heat stress; taking care to choose suitable

plants which improve natural capital and biodiversity and are resistant to emerging pests and diseases.

3.10 The CAS approach sits well with the TE2100 Plan riverside strategy approach. This integrates improvements to flood risk management defences into wider redevelopment, enhancing the social, environmental and commercial aspects of the riverside. The Environment Agency is encouraging councils and strategic planning authorities to use this approach to achieve additional benefits whilst addressing climate change related flood risks. Figure 1 summarises the co-benefits that will result from this Riverside Strategy Approach.

3.11 Following this approach, the City's ambition is to take every opportunity to create an attractive, accessible riverside which is resilient to the increasing risks of flooding through this century.



Figure 1: Benefits of the TE2100 Riverside Strategy Approach

4. Where are we now?

4.1. The City's riverside and surrounding area is used in a variety of different ways; ranging from an office or residential location, educational use, recreational uses and safety elements, and has routes for walking, cycling and public transport. It is a dynamic area that has evolved over time to become what it is now, a historic, multi-use area.

4.2. In order to develop a strategy that incorporates all these elements, it has been necessary to understand the existing riverside features and how they add to the character and environment of the area.

4.3. An extensive desktop study was undertaken (including commissioned a UAV drone survey) to help identify the scale of the challenge faced along the City's

1.5 mile stretch of riverside. Appendix 1 provides detailed maps and assessment of the following aspects:

- Raising requirements – end of Stage 2 (2065)
- Raising requirements - end of Stage 3 (2100)
- Non - developable sites
- Historic environment
- Land use and ownership
- Access to the riverside
- River safety
- Natural capital and biodiversity
- Public realm furniture
- Lighting

The research and evidence have informed the Implementation Approach and Design policies set out in section 5 of this strategy.

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5. Realising our vision

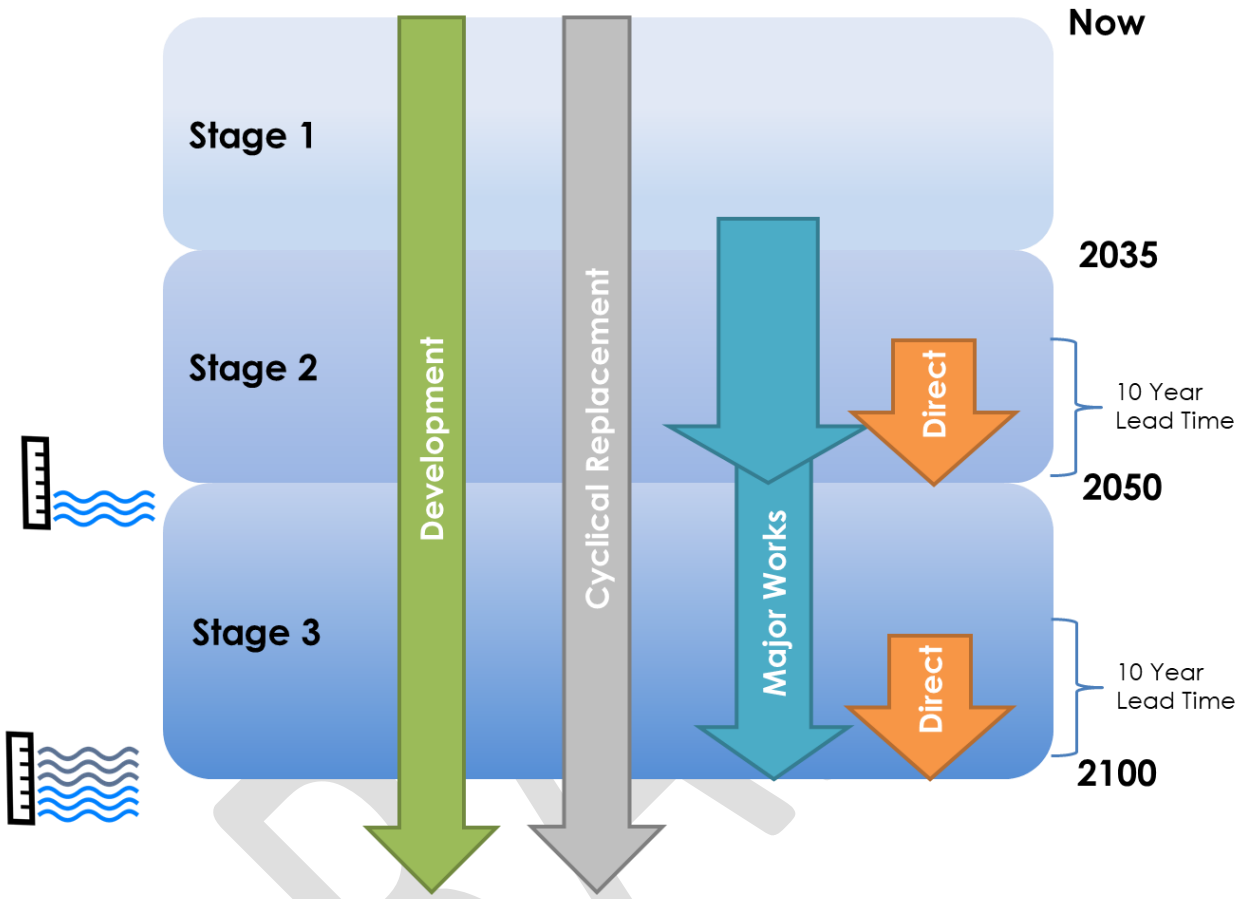

Figure 2: Suitable interventions for each time horizon

5.1. The long-term nature of this strategy risks decisions being delayed until later in the century. This would result in missed opportunities and increased costs in the future. By setting out what can be done in each time period (fig 3), this strategy leads the way in resilience planning, reducing disruption and overall cost of works. Each element of the strategy includes:

- the strategy point and the related policy
- why the policy is a good approach
- when the policy will apply and for how long
- in which areas the policy is relevant
- how the policy can be taken forward (recommendations)

IMPLEMENTATION APPROACH

5.2. The approach to implementing raising is detailed in the policies set out below. These policies outline the expected response to flood defence raising as opportunities arise as a result of development and cyclical maintenance. It is recognised that some parts of the riverside will need a coordinated approach

across several adjacent sites. It is proposed that major works are planned and co-ordinated to minimise disruption for riverside occupiers and users. Finally, some sections will not be covered by the preceding scenarios and will require direct intervention before the implementation dates set out in the TE2100 plan.

IMPLEMENTATION APPROACH – TE2100 alignment SP1

SP1 - TE2100 alignment

The City of London Corporation will follow the adaptive approach set out in the Thames Estuary 2100 Plan, using the dates and time periods it sets out. The City Corporation will commit to working in partnership with the Environment Agency, neighboring London Boroughs and other relevant parties to achieve the long-term aims of the Thames Estuary 2100 Plan.

5.3. The Thames Estuary 2100 Plan is the partnership plan for maintaining the flood defences for the entire tidal Thames. By committing to the timeframes as set out by the TE2100 Plan (and any revisions thereof) the City Corporation will be able to ensure that its flood defence remain sufficient for the risk and maintain the continuity of the wider defence with adjoining areas, including the London Boroughs with which it shares a riparian and land boundary (City of Westminster, London Boroughs of Tower Hamlets and Southwark).

5.4. This strategic point is a continuation of the City Corporation's existing policy and should continue to be applied going forward. This strategic point applies generally to the whole of the City's riverside.

SP1 Recommendations:

1. The City Corporation should continue to include in its Planning Policy and Local Plan an alignment with the TE2100 requirements
2. The City Corporation should regularly review the Riverside Strategy to coincide with reviews and updates of the TE2100 Plan and the City's own Local Plan.
3. The City Corporation should maintain a robust partnership with the EA, neighbouring boroughs and other partners in support of the wider TE2100 plan.

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Three time horizons – three themes for flood risk management

First 25 years	The first 25 years from 2010 to 2034 **"Maintaining confidence and planning together"**	• Continuing maintenance, operation and essential improvements. • Creating new habitats, safeguarding the spaces for future flood management and working in partnership with others to reduce flood risk. • TE2100 will have a real influence in the preparation of, and updating of local strategic and spatial plans.
Middle 15 years	The middle 15 years from 2035 to 2049 **"Renewal and reshaping the riverside"**	• Many of the existing walls, embankments and smaller barriers will need raising and major refurbishment or replacement in this period. • These major projects provide an opportunity to reshape our riverside environment through working with spatial planners, designers, environmental groups and those who live and work in the Estuary area.
Up to 2100	To the end of the century from 2050 **"Preparing for, and moving into the 22nd century"**	• From 2070 (based on government's current climate change guidance) a major change will be needed. • The decision on the "end of the century" option to be adopted must be made at the start of this period followed by planning and preparation for implementation • By 2070, flood risk management arrangements must be in place to take us to the end of the century – and beyond.

Figure 3: Thames Estuary 2100 Plan time horizons

IMPLEMENTATION APPROACH – Development SP2

SP2 - Development:

Where development is proposed on a riparian site the following will be expected at each stage:

Stage 1 (2021-2034): As a minimum the developer must demonstrate that the flood defence is capable of being raised to the future level. Developers are encouraged to implement raising to the 2100 level at this time where feasible.

Stage 2 (2035-2065): As a minimum, when new sites come forward for development during this period developers will be required to raise the river defence to at least the 2065 level and demonstrate that future raising to higher level is feasible. Developers should implement raising to the 2100 level at this time where feasible.

Stage 3 (2065 onwards): When new sites come forward for development during this period, developers will be required to raise the river defences to the 2100 level.

5.5. Development where it occurs in the immediate vicinity of the river can offer a cost-effective and less disruptive opportunity to provide defence raising and to implement a design that provides wider holistic benefits to the riverside. In addition, it offers an opportunity to resolve conflicts with building levels and the defence levels. The infrequent nature of development is likely to mean that this opportunity will not occur multiple times for individual sites during the course of this strategy.

5.6. Going forward there will be a continuation of the policy requiring developers to demonstrate that future defence raising is possible, this should include that the building will not be negatively impacted by future raising and developers are encouraged to raise defence levels to the 2100 level as part of the

development. From 2035 developers will be required as part of major new developments to raises defence levels to at least the 2065 level and as a minimum demonstrate that future raising to the 2100 can be accommodated.

5.7. This strategic point is a continuation and enhancement of existing policy which will apply from now on. This point will apply generally to the entire riverside where development is likely.

SP2 Recommendations:

1. The City Corporation should clarify existing planning policy through an update to the Thames Strategy Supplementary Planning Document (SPD)
2. The City Corporation should produce guidance on demonstrating the feasibility of future defence raising, this should include guidance on potential impacts that need to be addressed and resolving conflicts with adjoining sites.

IMPLEMENTATION APPROACH – Cyclical replacement and maintenance SP3

SP3 - Cyclical replacement and maintenance:

Where the City Corporation is responsible for the maintenance of the river defence, should a section need replacing or a major repair, raising opportunities should be evaluated for each stage (other riparian owners should be encouraged to take a similar approach):

Stage 1 (2021-2034): As a minimum the City Corporation must consider the feasibility of raising the river defence as part of the works or at least enabling future raising.

Stage 2 (2035-2065): As a minimum the City Corporation must enable future raising to the 2065 level where feasible and consider the feasibility of implementing to the higher level as part of the works.

Stage 3 (2065 onwards): The City Corporation must consider the feasibility of raising the defence as part of the works and enabling future raising to the higher level.

Riparian owners should take account of river wall raising on adjacent sites and co-ordinate works where feasible

5.8. All river defences have a limited effective lifespan and require regular maintenance. Across the time period concerned with this strategy it is possible that some defence structures will need replacement, which presents an opportunity incorporate raising and associated co benefits. Conversely where direct intervention is undertaken to implement raising, the life expectancy of the defence should be assessed and if appropriate the opportunity taken to consider wholesale replacement of the asset.

5.9. This is a new approach for the City Corporation as a riparian owner and should be implemented going forward, other riparian owners should be encouraged to follow suit through demonstration of best practice. The point applies generally to the entire riverside.

SP3 Recommendations:

1. The City Corporation should change its internal procedures to ensure raising is considered as part of cyclical works.
2. The City Corporation should work in partnership with the EA asset monitoring team to encourage riparian owners to consider raising as part of their own maintenance regime.

IMPLEMENTATION APPROACH - Major works SP4

SP4 - Major works:

The City Corporation will work with the Environment Agency and riparian owners to identify stretches where major substantive works will be required to implement raising and seek to ensure that these come forward at the appropriate time such that:

Stage 1 (2021-2034): The City Corporation will have identified the stretches covered by this implementation approach, and instigated planning in conjunction with other stakeholders as required.

Stage 2 (2035-2065): By the end of this period the stretches identified at Stage 1 will have been raised to at least the 2065 level.

Stage 3 (2065 onwards): Further progress on these stretches will have ensured that the defences are raised to the 2100 level before the end of the century.

5.10 Some stretches of the river defence require significant works to enable raising and are either; due to their position unlikely to come forward as part of a development or are where a single structure covers multiple riparian sites in a way that restricts the capacity for a single development to implement raising meaningfully. Where this occurs a more thorough approach will be needed to ensure that raising occurs in a coordinated and timely fashion and incorporates appropriate co-benefits. When these sites occur at the City's boundary further considerations will be needed to ensure continuity with the neighboring borough.

5.11 It is likely that this approach will be required for raising to the Victoria Embankment, which mostly sits within the City of Westminster. Other possible structures which have been identified include London Bridge and the board walk structure over the river from Adelaide House to Old Billingsgate.

5.12 Dealing with these sections in a coordinated way, assists in overcoming challenges within a suitable timeframe and may unlock opportunities for external funding.

SP4 Recommendations:

1. The City Corporation should conduct a review of the flood defences within the Square Mile to identify areas where major works may be needed, including but not limited to:

a. Victoria Embankment: With Westminster City Council and other interested parties (including Transport for London as Highway and Traffic Authority) to consider issues arising from the need to raise the flood defences at Victoria Embankment.

b. Adelaide House to Old Billingsgate Market: With riparian owners and other interested parties to consider issues arising from the need to raise or replace flood defences at the elevated walkway structure between Adelaide House and Old Billingsgate Market.

c. London Bridge: Conduct a detailed engineering review of the implication of heightened water levels on the balancing structure with London Bridge's northern and southern abutments.

IMPLEMENTATION APPROACH - Direct intervention SP5

SP5 - Direct intervention:

Where raising is required but has not been fulfilled by the other implementation approaches (including where works have only prepared for future raising) the following should be undertaken:

Stage 1 (2021-2034): The City Corporation will engage with riparian owners to help them understand their legal responsibilities for flood defence raising and the consequences and implications on their sites of future raising.

Stage 2 (2035 – 2065): Stretches still requiring raising ten years before the end of stage 2 will be identified and the City Corporation as Lead Local Flood Authority will work with the Environment Agency to enable riparian owners to fulfil their legal responsibility under The Metropolis Management Act (1879 to 1962) for flood defence raising at least to the 2065 level.

Stage 3 (2065 onwards): Ten years ahead of the end of the century raising date any stretches yet to be raised to the higher level will be identified and the City Corporation as Lead Local Flood Authority will work with the Environment Agency to enable riparian owners to fulfil their legal responsibility for flood defence raising.

5.13 Any remaining sites where defence raising has not been implemented alongside development, other works or major projects, will need to be addressed through direct intervention in order to provide a contiguous defence. These interventions should seek to improve the riverside as much as is feasible in line with other policies in this strategy. The City Corporation as LLFA, will work with the Environment Agency as enforcement authority, to ensure that riparian owners are able to fulfil their legal responsibilities resulting in continuous protection from sea level rise along the City's riverside.

5.14 This strategic point will be a progression of SP 2,3 and 4 beginning at the start of the second epoch and will need to be completed by the first raising point. This will apply at discreet local sites along the length of the riverside.

SP5 Recommendations:

1. The City Corporation should produce tailored site-specific guidance on raising requirements through Flood Risk Briefing Notes for individual riparian sites. Detailed technical designs will be the responsibility of riparian owners.
2. The City Corporation should develop a riverside flood defence communication strategy targeted at riparian owners which aims to establish a partnership approach and raise awareness of the flood risk of individual sites.
3. The City Corporation should maintain an up to date record of flood defence levels to identify sites that will need direct intervention at key dates

IMPLEMENTATION APPROACH – Sequencing of flood defence raising SP6

SP6 - Sequencing of flood defence raising

Where stretches will require raising in both periods (2065 and 2100) riparian owners or their agents should consider the feasibility of implementing the complete raising in a single intervention and as a minimum demonstrate that the higher level of raising is achievable.

5.15 In the stretches which require the most raising it may be more economical and cause less disruption to implement raising to the 2100 level at the same time as the implementing the earlier level. This will be most appropriate where changes to associated structures with a design life that exceeds 2100 will also be required. As a minimum works to raising should demonstrate that further raising is achievable in future. In some locations it will be more appropriate to implement raising to the different levels at separate times, particularly where the design life expectancy of the defence structure may mean the asset needs replacing ahead of 2100.

5.16 The TE2100 Plan will be reviewed periodically to ensure its effectiveness in the face of climate change. The raising requirements are unlikely to change but the dates may be brought forward if sea level rise accelerates. This possibility should be considered when assessing each site.

5.17 This strategic point should be considered for all raising intervention types and will apply to all sites that require raising at the end of the first epoch.

SP6 Recommendations:

1. The City Corporation should use the review of the City of London Strategic Flood Risk Assessment to evaluate the feasibility of single or multistage interventions.

DESIGN

5.18 The City of London Riverside Survey report (Sept 2020) produced by Arcadis for the City Corporation includes a range of possible options for flood defence raising (appendix 2). Decisions on the most suitable option will need to be considered on a site by site basis taking account of engineering constraints,

permits and licenses, planning considerations, aesthetics and potential for co-benefits.

DESIGN – Flood defence and walkway continuity SP7

SP7 - Flood defence and walkway continuity

Where raising is being considered, either through immediate works or in preparation for future raising, sufficient consideration shall be given to the adjacent sites and walkway levels to ensure the continuity of the defence and the riverside walk.

5.19 Raising an individual stretch, either through development or as part of cyclical works will affect the surrounding defences and walkway levels, particularly if these also require raising. The boundary of defences should be designed to enable raising the appropriate level in future and landscaping should enable level access between sites for all stages of implementation. Similar consideration will be required when demonstrating the achievability of future raising.

5.20 The walkway level plays an important role in the users experience of the riverside and how it functions as a space. It affects both the loading on the riverside defences, the interaction with adjoining buildings and provides inherent resilience to flooding. Provided that the walkway height is at a suitable height future raising should be able to be achieved within the parapet in most cases. Establishing a walkway level early can also benefit maintaining the accessibility and continuity of the riverside path and access to riparian assets such as river steps, piers and jetties.

5.21 Approvals for such works must ensure that the continuity of the flood defence and walkway with adjacent properties is maintained and future raising of adjacent sections is not compromised. The historic nature of the walkway and implications for historic assets and archaeology will be a consideration in the development of proposals. Where practicable walkway access should also be maintained during construction.

5.22 This strategic point will apply going forward and will apply in locations where stand-alone raising or development take place. It will be a particular consideration for sites on the Local Authority boundary.

SP7 Recommendations:

1. The City Corporation should produce guidance on demonstrating the feasibility of future defence raising; which should include the need for suitable designs which ensure continuity of both the flood protection and the riverside walk whilst avoiding compromising future raising of neighbouring sections.
2. The City Corporation should update the Riverside Walk Enhancement Strategy to take into account the need to provide a continuous defence and inclusive access between sites.

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3. The City Corporation will work with the EA to ensure that flood defence and walkway continuity are considered as part of the defence permitting and licensing scheme.
4. The City Corporation will work with the London Borough of Southwark to ensure that London Bridge and Blackfriars Bridge's southern bridgeheads continue to provide a continuous flood defence along the southern bank of the Thames.

DESIGN – Accessibility SP8

SP8 - Accessibility

Defence raising should maintain access to and improve the accessibility of the existing Thames Path along the City's riverside and enhance connections with the rest of the City, including during construction.

5.23 The Thames Path National Trail runs along the north bank and the City Corporation has successfully secured public access parallel to the river for much of this stretch. The current diversions are a distraction for users and diminish the linear form of the public realm. As well as being part of the national path the riverside should be considered an important local east-west walking route. In recent years the City Corporation has through implementation of the Riverside Walk Enhancement Strategy undertaken work to provide step-free access across the route and to riverside infrastructure including piers, jetties and lifts. Works to defence raising should not diminish this and where possible should improve accessibility through appropriate treatment of difference in walkway levels.

5.24 The City's riverside is separated from the rest of the City by a series of busy roads including dual carriageways and underpasses. At grade crossing points are infrequent and high-level walkways can be disjointed and difficult to navigate. Every opportunity should be taken to improve the connection of the riverside with the rest of the City through crossing points and opening up views of the riverside in between buildings.

5.25 This is a continuation of the City Corporation's existing approach and will apply along the full length of the City's riverside.

SP8 Recommendations:

1. The City Corporation should continue to secure public access to an uninterrupted riverside pedestrian route through implementing planning policy as part of the Thames Strategy SPD. This shall include seeking opportunities to improve connectivity between the City's riverside and the wider area.
2. The City Corporation should ensure that accessibility remains a focus of updates to the Riverside Walk Enhancement Strategy.
3. The City Corporation should produce planning guidance on demonstrating the feasibility of future defence raising. This will include a requirement to provide level access between sites and allow for further works where raising is

proposed to occur at different times. This will apply during construction and thereafter.

DESIGN – River safety SP9

SP9 - River safety

River safety must be of primary concern and must not be compromised in the design, construction and the ongoing use of the river, flood defences and riverside walk.

5.26 Through the Port of London Act 1968 (as amended), the Port of London Authority (PLA) has the primary responsibility of maintaining safe access and managing and supporting the safety of vessels, the general public and all users of 95 miles of the tidal River Thames. A PLA River Works License is required for all works on the riverside.

5.27 River Safety is of paramount importance and is dependent on a range of structures and riverside equipment including stairs connecting the foreshore to the riverside walk, access/egress ladders and grab chains along the whole length of the City's riverside. In addition, drowning and suicide prevention equipment such as lifebuoys, barriers and signs are key to preventing fatalities in the river. The PLA's 'A Safer Riverside' guidance (2020) provides best practice for developments alongside and in the tidal River Thames. The Tidal Thames Water Safety Forum's 'Drowning Prevention Strategy (2019) gives further information on suicide prevention measures.

5.28 Designs for flood defence raising must ensure that river safety equipment is extended to the new flood defence height, including points for accessing to and from the foreshore. The effectiveness of the safety equipment must be retained throughout construction periods and ongoing maintenance regimes must be put in place.

5.29 This requirement applies along the whole length of the City's riverside and will take priority. Mapping, maintenance and inspection of river safety equipment will be particularly important as changes are made to the flood defences and adjoining riverside walk and foreshore

SP9 Recommendations:

1. The City Corporation should work with the Environment Agency licensing teams to ensure that work on the flood defences is conditional on the retention of functioning safety equipment throughout any works and ongoing maintenance thereafter.

DESIGN – Biodiversity SP10

SP10 - Biodiversity

Opportunities for terrestrial and aquatic biodiversity should be designed into flood defence raising and associated works to create a 'string or pearls' of habitats. Works

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should consider future raising needs, be designed for future climate projections and not encroach into the river.

5.30 The River Thames is a site of metropolitan importance for nature conservation providing habitats and movement corridors for a range of species. As well as conserving existing natural capital features, such as established tree canopies, works on the riverside provide an opportunity to enhance this biodiversity and will be expected to deliver a net gain in biodiversity. As a south facing riverside the impact of climate change on heat stress will be a key issue as temperatures rise and periods of drought increase. Care must be taken to ensure that planting designs are suitable for the future climate and resilient to the pests and diseases that will become more prevalent.

5.31 For development sites a target Urban Greening Factor of 0.3 has been set in the City Plan 2036 Other sites should aim to achieve this level of greening where possible. All development and sites should aim to deliver a net gain in biodiversity through improvement or maintenance works and consideration should be given to the Biodiversity Action Plan 2021-26 (BAP). Aquatic environments should be a focus for achieving Biodiversity Net Gain for riverside sites.

5.32 Estuary Edges guidance, coordinated by the Thames Estuary Partnership, provides a set of design principles which will maximize the ecological value of the riverside on both the land and in the water. A key concept within the guidance is the creation of a 'string of pearls' of habitats, meaning than all intervention can contribute to wider improvements to biodiversity.

SP10 Recommendations:

1. The City Corporation should incorporate the estuary edges guidance as appropriate into the Riverside Walk Enhancement Strategy and other guidance as applicable.
2. Those undertaking work to the flood defence should seek expert ecological advice when designing works on the riverside to maximize natural capital benefits, deliver net gains in biodiversity and ensure the longevity of planting in the face of climate change.

DESIGN – Historic environment SP11

SP11 - Historic environment

The significance of the heritage assets, including their setting, on the riverside must be protected and enhanced and opportunities for education and interpretation included wherever possible.

5.33 The rich history of the City's riverside is obscured by layers of development and visible only as glimpses in certain areas. The flood defence walls and associated structures are listed in some locations e.g. Victoria Embankment and there are scheduled ancient monuments at Baynard House and Queenhithe Dock. Many

riverfront buildings and structures are designated heritage assets, listed buildings or Scheduled Monuments and may be in conservation areas. There are also areas of significant archaeological potential and non-designated assets.

5.34 Proposals that may alter or affect heritage assets would need careful consideration of potential options and their impact to protect the special architectural and historic interest of a listed building. Where works involve disturbance to the foreshore, permissions, licenses and permits will be required and any archaeological finds must be recorded with the Museum of London.

5.35 This strategy provides a significant opportunity to incorporate education and interpretation along the riverside through temporary and permanent exhibitions and signage.

SP11 Recommendations:

1. The City Corporation's design and archaeology team, Historic England and the Museum of London must be consulted during the design stage for all works on the City's riverside and their recommendations agreed and implemented.
2. The City Corporation should include sections on historic sensitivity in the Flood Risk Briefing Notes for individual riparian site.

DESIGN – Buildings, facilities and infrastructure interfaces SP12

SP12 – Buildings, facilities and infrastructure interfaces

Designs must take account of the interface between buildings, riverside facilities, infrastructure, walkways and flood defences to maintain functionality, accessibility, and views of the Thames.

5.36 The buildings along the Thames riverside have many points where they interface with the river and riverside environment. This includes entrances and thresholds which align with the walkway levels, window heights which allow views towards the river and in some cases steps down to the river. In some areas, basements will be within the zone of the defence structure. As the flood defences and walkways are raised buildings will need to be designed or modified in relation to the new levels.

5.37 The City's riverside has a number of marine structures and infrastructure that provides facilities for river use. This includes the Safeguarded Walbrook Wharf, Blackfriars Pier, Crown Pier and several other mooring points, including private facilities and infrastructure not currently in use. Defence raising works could present an opportunity to increase the provision of riverside facilities.

5.38 The flood defences also accommodate infrastructure such as sewer outflows, as well as moorings and access piers for river craft. Designs must incorporate the necessary infrastructure for continued use of these facilities and riparian owners should work with infrastructure owners and providers to achieve this.

When new infrastructure is required its design should take account of future defence raising.

5.39 From now onwards whenever changes to buildings, facilities and infrastructure are undertaken through redevelopment, refurbishment or maintenance, the relationship to the 2100 flood defence levels must be considered through design. For some areas this will require minimum intervention whilst others will need significant alteration. The defence raising requirement map provides an indication of the most challenging areas where maximum defence raising is required. Special attention must be given to historic buildings to ensure that historically significant features are conserved or enhanced through this process.

SP12 Recommendations:

1. The City Corporation should produce planning guidance on demonstrating the feasibility of future defence which will include building and infrastructure interfaces
2. The City Corporation as LLFA and the Environment Agency, as part of its riverside flood defence communication strategy, should engage with riparian owners to highlight future requirements and encourage them to take action ahead of the deadlines for flood defence raising. A riverside partnership would facilitate collaborative working between affected riparian owners.

DESIGN – River views SP13

SP13 - River views

All works on the riverside must be designed to maintain views of the river from pedestrian walkways, seating areas, buildings and the lanes and passages between buildings

5.40 Views of the River Thames from the riverside walk, adjacent seating areas and glimpsed between buildings provides a unique context for the southern part of the City. Insensitive flood defence raising could obscure views of the river and the rich range of activities it supports. The opportunity to view the river from ground and first floors of riverside buildings and the public realm is greatly valued by occupants and should be incorporated into designs taking account of future defence raising needs. Views for wheelchair users and children should be maintained.

SP13 Recommendations:

1. The City Corporation should incorporate guidance on the importance of river views into the Flood Risk Briefing Notes for individual riparian sites.

DESIGN – Flood defence and edge protection SP14

SP14 - Flood defence and edge protection

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Works to the riverside must result in a functional flood defence, effective edge protection and should incorporate principles of good riparian design.

5.41 The flood defences and edge protection measures are a significant element in the riverside public realm, affecting user experience of the riverside walk. With notable exceptions the flood defences also form the edge protection to prevent people from entering the water. In some places the edge protection takes the form of railings or parapets above the functional flood defence. As a general principle, the edge protection should prevent people from climbing over, through or ducking under but should allow safe egress from the tidal River Thames or the foreshore. Parapets should be designed to act as a barrier that prevents anyone from sitting or climbing on them.

5.42 Raising the functional flood defence will result in changes to the edge protection in places, for example by replacement of railings with a solid structure. These changes will impact on the feel of the associated riverside and should be designed sympathetically to the surrounding site. Raising could also impact the surface water drainage arrangements for the riverside by disconnecting the direct route to the river.

5.43 Taking into account the other design related strategy points, proposed works should apply the principles of good riparian design to ensure that appropriate designs are implemented.

5.44 This strategic point is a continuation of the existing planning and corporate policy and corporate policy and will apply to all stretches requiring raising.

SP 14 Recommendations:

1. The City Corporation should produce guidance on demonstrating the feasibility of future defence raising which promotes best practice in riparian design and that this should be incorporated into future updates of the Riverside Walk Enhancement Strategy.

DESIGN – Lighting SP15

SP15 - Lighting

Suitable lighting must be maintained along the riverside but lighting columns should be removed from the flood defence structures, to enable future raising, unless they are of historic significance.

5.45 The flood defence wall throughout most of its length supports lighting columns some of which are of historic significance. This will present challenges to incremental raising of the flood defence for 2065 and 2100 requirements. As a general principle, lighting columns should be removed from the flood defence structures unless they are of particular historic significance e.g. Sturgeon Lamps. The City Corporation has published a Lighting Strategy including recommendations for lighting of the City's riverside (section 4.3.14). Designs should comply with this guidance whilst maintaining continuity along the

riverside, due regard should also be given to impacts of lighting on ecology and to ensure that there is no negative impact on river navigation.

5.46 Subways and underpasses present opportunities for lighting to the walls as well as bridge soffits to help create positive thresholds for pedestrians after dark.

5.47 Undercrofts may present challenges where flood defence raising reduces light level during the day. Maximum natural light and views of the river should be maintained by using glass for raising where possible.

SP15 Recommendations:

1. The City Corporation team should ensure that future updates of the lighting strategy and riverside walk enhancement Strategy retains historic lighting but enables incremental raising of the flood defence structures
2. Those undertaking works to the flood defence should retain or reposition lighting structures of historic significance to enable flood defence raising.

FUNDING SP16

SP 16 - Funding

The City Corporation will work with the Environment Agency, Defra, the Greater London Authority and riparian owners to explore effective funding mechanisms for future flood protection to combat sea level rise in line with the TE2100 Plan.

5.48 A key issue that has arisen throughout discussions on implementing the Thames Estuary 2100 Plan is that of funding and who will be responsible for funding the required works.

5.49 The Metropolis Management (Thames River Prevention of Floods) Amendment Act 1879 requires riparian owners to carry out flood works maintaining the flood defences that they own. The act defines flood works as follows: *The expression "flood works" means the entire or partial construction, alteration, reconstruction in the same or any altered position of any bank and the repairing, raising, strengthening improvement or removal of any bank and the enlargement, contraction, raising, lowering, arching over, improvement or alteration of any sewer, channel or water course, and the discontinuance, closing up or destruction of any such sewer channel or watercourse necessary for the protection of lands within the limits of this Act from floods or inundations caused by the overflow of the River Thames*.

5.50 For the City's short stretch this would apply to over 20 riparian owners. The costs for each riparian owner will vary depending on the length of flood defence, the level of raising required, the opportunity to incorporate raising into other planned works and the degree to which they incorporate other benefits. Other potential options for funding include the use of a Community Infrastructure Levy which could be applied to all areas that would benefit from the improved flood defences. Alternatively, the flood defence raising could be centrally funded as a nationally significant infrastructure project or through flood defence grant in aid with contributions from beneficiaries. Exploration of these options is outside

the scope of the City Corporation's strategy and must be considered at a wider scale. The City Corporation will seek to carry out a cost benefit analysis for some City Corporation owned sections of the flood defence. This will provide evidence for funding discussions, and a realistic picture of potential costs to riparian owners of implementing the TE2100 Plan.

5.51 Some riparian owners may challenge the legal basis of this requirement and the degree to which other TE2100 planned works such as replacement of the Thames Barrier should prevent the need for local defence raising. The logistics of ensuring that the whole of the flood defence is raised to the required level and connected to adjacent stretches will be a challenge. There is a danger that lack of funding will result in riparian owners failing to adequately complete this task. There are also challenges in establishing ownership and riparian responsibility, particularly where flood defence structures are not associated with adjacent buildings or extend over the riverbed or where lease arrangements are in place.

SP15 Recommendations:

1. The Environment Agency should work with central Government, the GLA, LLFAs and riparian owners to establish what level of financial support will be needed to implement the TE2100 riverside strategy approach.
2. The Environment Agency, Defra or GLA should develop a mechanism for Thames wide financial support to ensure that flood protection is not compromised by lack of funding.
3. The City Corporation should seek to carry out a cost benefit analysis for raising of some City Corporation owned sections of the flood defence.
4. The City Corporation as LLFA should assist with funding applications for the raising of flood defence infrastructure.

GOVERNANCE and STRATEGY REVIEW SP 17

SP17 - Governance & strategy review

The Planning & Transportation (P&T) Committee, supported by the officer level Flood Risk Steering Group, will oversee the implementation of this strategy which will be reviewed at least every 10 years.

5.52 Sea level rise and other climate impacts are dependent on the global effort to reduce carbon emissions in line with the Paris Agreement. Ten-year reviews of the UK Climate Projections (UKCP18) and the Thames Estuary 2100 Plan will highlight changes in the speed of sea level rise. This in turn will influence the dates when action is needed for local flood defences. If sea level rise accelerates the dates may be brought forward rather than the actions changing. Alongside this the City Corporation has committed to reviewing its Strategic Flood Risk Assessment every five years providing local data to inform this strategy. These sources of evidence are essential to ensure that the City's response takes account of the latest climate data.

5.53 The City Corporation's actions as Lead Local Flood Authority have been delegated to the P&T Committee. The actions outlined in this strategy will be implemented and monitored through the City Corporation's statutory Local Flood Risk Management Strategy (LFRMS) reporting progress annually to the P&T Committee, the Environment Agency and Defra.

SP16 Recommendations:

1. The City Corporation will keep up to date with climate impacts on the City's riverside through a range of evidence sources and review this strategy at least every 10 years.
2. Implementation, monitoring and reporting will be through the LFRMS and will be overseen by the officer level Flood Risk Steering Group and P&T Committee.

6. IMPLEMENTATION, RESOURCES and RISKS

6.1 The implementation of this strategy will be led by the City Corporation in its statutory roles as Lead Local Flood Authority and Local Planning Authority. The adopted Local Flood Risk Management Strategy 2021-27 (LFRMS), which is a requirement of the Flood and Water Management Act 2010, includes a commitment to prepare a Riverside Strategy. This strategy will drive forward the requirements of the Thames Estuary 2100 Plan to reduce the risk of flooding, while unlocking sustainable growth opportunities along the Thames in the Square Mile, including protecting heritage assets.

6.2 Where recommendations relate to external bodies, existing partnerships and relationships shall be used where possible to facilitate these actions. Governance structures, confidentiality agreements, and memorandums of understanding will be used where necessary to facilitate partnership working. setting out the key objectives, working arrangements, decision making processes and any dispute resolution for the duration of the collaboration.

6.3 The City Corporation has developed a range of resources which have informed this strategy and are available on request:

- Drone video showing the City's riverside – July 2020
- Point cloud of the flood defences and riverside - July 2020
- Survey report including details of the flood defence structures and possible raising options 2020
- Flood Risk Briefing Notes for individual riparian sites on the City's riverside
- City of London Strategic Flood Risk Assessment
- Strategic Environmental Assessment SEA and Equalities Test of Relevance

6.4 This strategy has been developed in response to Corporate and Departmental risks relating to climate change and flood risk. The strategy seeks to provide

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both appropriate flood defences and shape an outstanding riverside space. Without appropriate flood defences, there is a risk of damage to property and infrastructure and potential loss of life through catastrophic flooding. If opportunities are missed to shape an outstanding riverside space, the experiences of riverside users will be greatly diminished with an impact on the City's reputation. This could also represent a failure to realise the full potential of the City's riverside as a strategically important asset.

6.5 There remains substantial uncertainty with regards to the speed and impact of sea level rise and the implementation, funding and future legislative requirements of the Thames Estuary 2100 Plan. This strategy has been developed fully acknowledging this uncertainty (and also the adaptive approach of the wider plan) and has been written to enable future flexibility while still allowing practical interventions now. However, this uncertainty still represents a risk to the successful implementation of this strategy.

7. APPENDIX 1 Where are we now – Riverside maps

See separate document

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This document summarises the evidence base for the City of London Riverside Strategy, providing data and mapping from our desktop study, drone survey and associated technical report and City Corporation Geographic Information System

City of London Riverside Strategy

Appendix 1 Where are we now – the evidence base

Raising Requirements – End of Stage 2 (2065)

In order to determine the magnitude of raising of the flood defence that is required to meet the TE2100 levels, we need to know what the current levels are. All of the tidal flood defences within the City currently meets the current statutory requirements from the Environment Agency (5.41m and 5,28m AOD upstream and downstream of London Bridge respectively). But there are large variations in how much they go above these levels

Raising requirements have been set out for both the end of Stage 2 (2065) the 2065 Level (5.8m AOD) and the end of Stage 3 (2100) the 2135 Level (6.3m AOD) (please note, these dates could be brought forward by the Environment Agency in line with climate change projections).

The magnitude of raising requirements were determined from a survey of the flood defence heights in July 2020. A survey measured the heights of the flood defences and consultants compared to the existing defence levels. This maps shows the indicative level of raising required for each section of the river flood defence to provide the 2065 defence level.

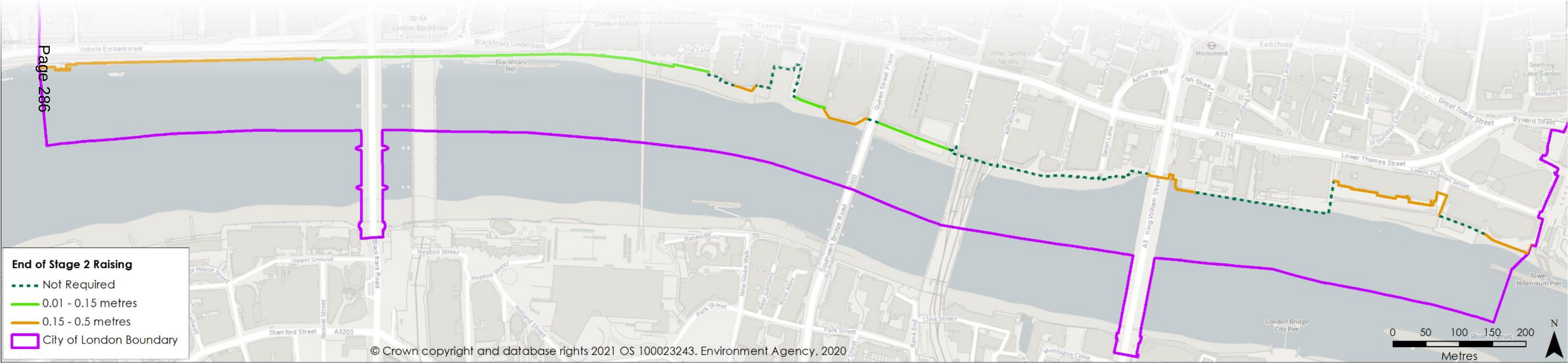
The survey made assumptions about the flood defence structures and more detailed surveys will be needed to ascertain the exact flood defence level for individual structures where works are proposed. This will be particularly important where the parapet is incorporated into the defence.

There are discreet areas in which no raising is required to reach the 2065 Level. Where raising is needed it is generally only up to 150mm with the exception of 6 sites which require more significant raising.

How does this impact the Strategy?

There are significant stretches of the flood defence which will not need to be raised before the end of Stage 2 (2065). The strategy should focus on the areas that require raising to first TE2100 level, whilst still enabling preparation for raising to higher level at a later time. Areas needing raising at the first stage will also need raising to the higher level in future, which will impact choices on implementing raising and the design for future raising.

The magnitude of raising required will impact the scope and range of benefits that raising may unlock.



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Raising Requirements – End of Stage 3 (2100)

The TE2100 Plan has two target dates at which different levels of raising need to be completed by. The later of these is for the end of Stage 3 (2100) and is intended to provide protection up to 2135 and requires a defence level of 6.3m AOD along the whole stretch of the City's riverside.

Similar to the Raising Requirements – End of Stage 2 map the current levels of the defence from the 2020 survey have been compared to the proposed flood defence levels. This gives an indication of the magnitude or raising required in each stretch.

The majority of the City's riverside will need some form of flood defence raising to achieve the higher level.

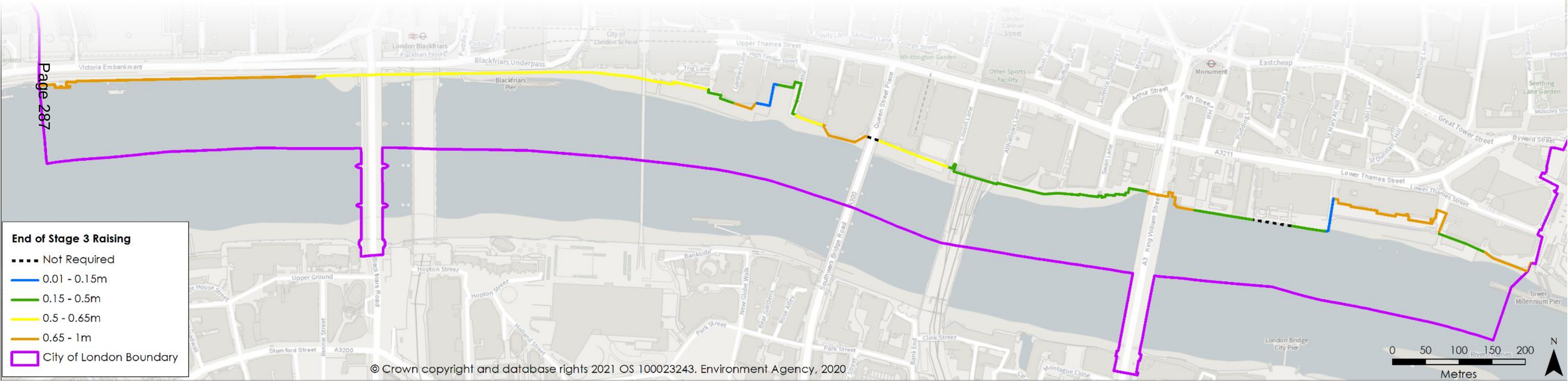
These raising requirements shown do not account for raising that will occur before Stage 3 to achieve the 2065 Levels. Work to reach the earlier level will be an opportunity to implement at the higher defence level at an earlier stage. At very least the earlier works should enable raising to the future level.

Adjoining sites require different levels of raising, the continuity of the defence should be accounted for especially where sections are raised separately.

How does this impact the Strategy?

The phasing of defence raising works will be impacted by the implementation method and whether previous works have been required to achieve the 2065 Level. Earlier raising to the 2135 Level and where works allow for future raising will minimise disruption in areas were direct intervention is required and will help towards ensuring a continuity of the defence.

The expected design life of defence structures will have to be considered when assessing the feasibility of raising the defence to the higher level.



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Non-Developable Sites

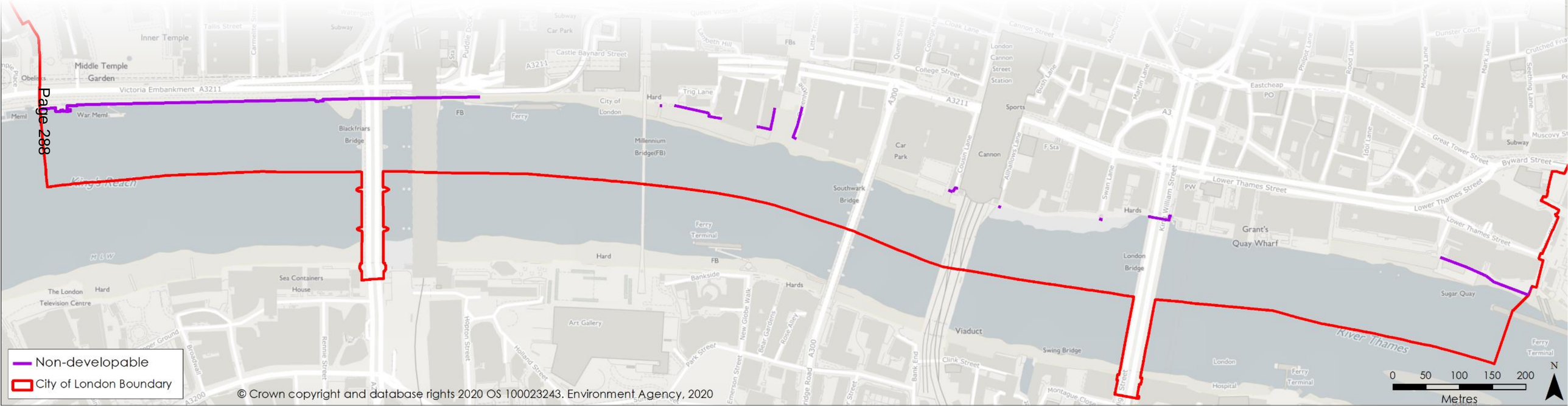
A proportion of the flood defence raising can be achieved through re-development of riverside sites over the coming years.

However, there are certain areas that have been identified that will not come up for development. These are areas such as Victoria Embankment that is not associated with a development as it is along a road. Also, areas that have recently been developed so will not come up again before the flood defences need raising.

Other areas include ends of roads down to the river such as the end of Cousin Lane and Allhallows Lane. These sites would be raised by direct intervention but would not be consistent with the rest of the riverside and would not benefit from the wider strategy aims. Making sure this does not happen is key.

How does this impact the Strategy?

As these areas have been identified, a plan needs to be in place on how these will be raised outside of developments.



Historic Environment

The whole riverside is of significant historical importance as it is the birthplace of London. The foreshore is littered with archaeological finds from history that have been logged on the *Greater London Historic Environment Records* database, but there will be many more that haven't been found yet.

There are 2 conservation areas adjacent to the riverside, The Temples and Whitefriars. Both are on the west side of the City.

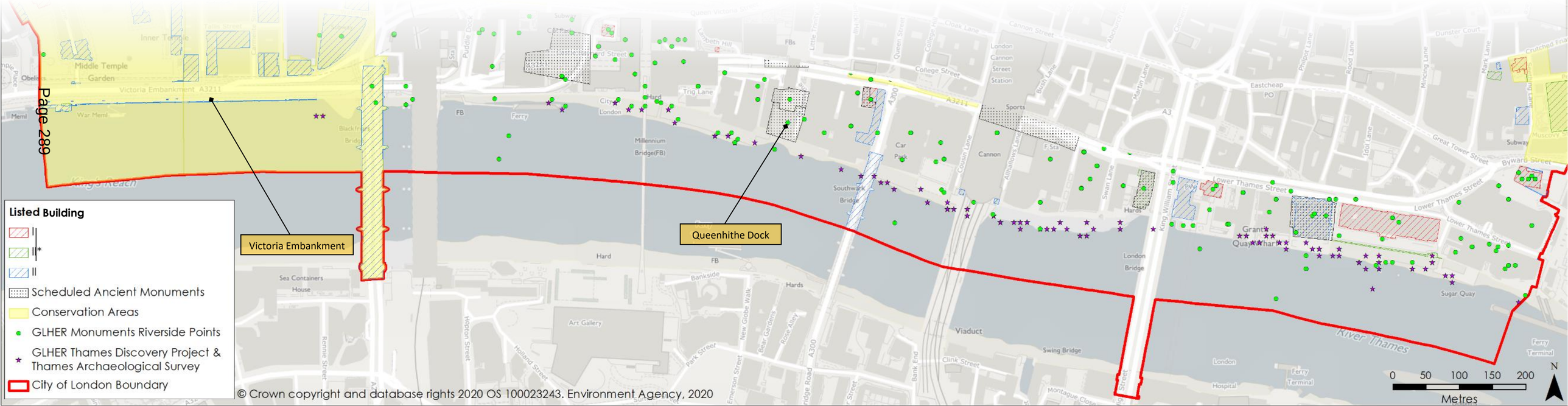
There are many listed structures along the riverside including bridges, railings, buildings and the actual flood defence, most notably the Victoria Embankment on the west side of the City.

There are also scheduled ancient monuments along the river, most notably the Roman and medieval waterfronts at Queenhithe Dock.

How does this impact the Strategy?

The City's riverside is steeped in history but much of it cannot be seen or appreciated currently. This bring an opportunity to bring out the historic important of the riverside through this strategy.

Sometimes historic assets can limit the amount of work that can be done on a site, but if this strategy makes sure to highlight the historic important of the riverside, then flood defence works and historic assets can work in harmony.



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Land Use and Ownership

There are over 20 different landowners along the Riverside with a mix of public and privately-owned land. Public owners include the City Corporation and other public bodies such as the PLA. Land use along the river is mainly commercial offices, with two distinct residential cluster. There are around 320 residential units in each clusters, this accounts for around 8% of the total City's residential units (City of London's LLPG, 2021). Currently, it is the landowners responsibly to maintain and raise the flood defence that falls within their boundary.

There is the additional layer of complexity with freeholders and leaseholders of land.

Different agreements may be in place about who pays for maintenance of the flood defence (therefore the raising), the freeholder or leaseholder.

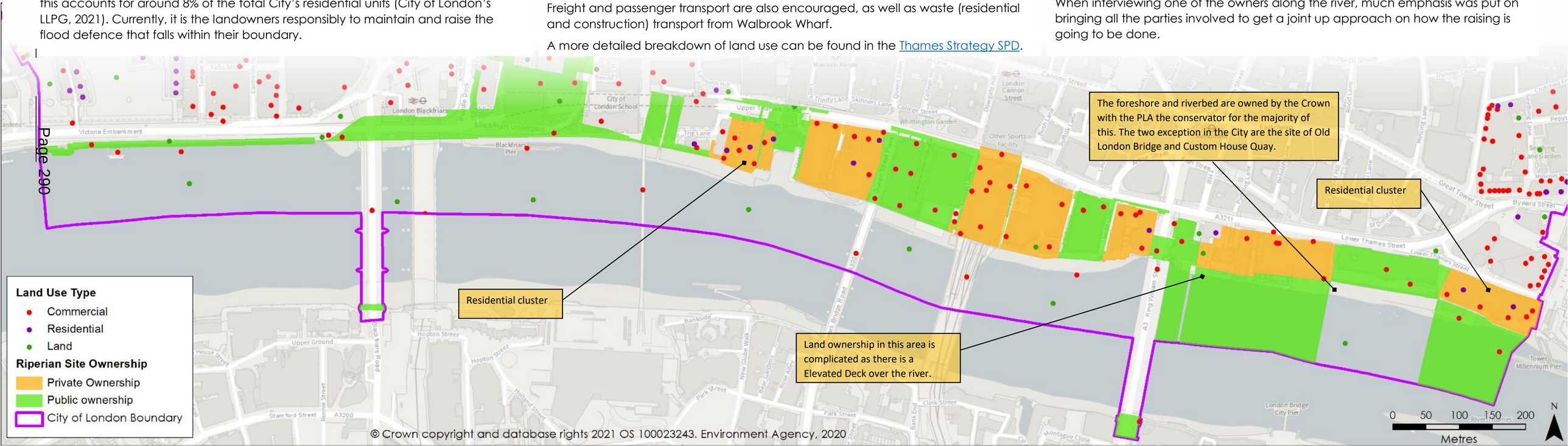
The emerging CityPlan 2036 promotes a mix of commercial and cultural uses being led by office development to add vibrancy to the riverside. Any development on or over the river is restricted to uses which require a riverside location for a river use. Freight and passenger transport are also encouraged, as well as waste (residential and construction) transport from Walbrook Wharf.

A more detailed breakdown of land use can be found in the Thames Strategy SPD.

How does this impact the Strategy?

With over 20 landowners, plus leaseholders, the individual raising of the flood defence by each owner could result in a sporadic, random mix of raising methods. This would impact the riverside walk and public access. Also, if one owner does not do the raising, the whole project fails. A strategy to make the flood defence raising coherent is vital to maintain riverside views and accessibility.

When interviewing one of the owners along the river, much emphasis was put on bringing all the parties involved to get a joint up approach on how the raising is going to be done.



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Access to the Riverside

Access to the riverside from the rest of the City is quite poor in most areas. As the riverside is built up, there are few opportunities to open up areas for access.

There is a busy road behind the row of buildings directly at the riverside. This is another barrier to access to the riverside as it can be hard to cross and is not a particularly pleasant environment.

There are a number of stairs and lifts that bring people to the riverside. Currently, the whole riverside walk is wheelchair friendly. However, the City Corporation has had long term success in securing public access to the riverfront via development.

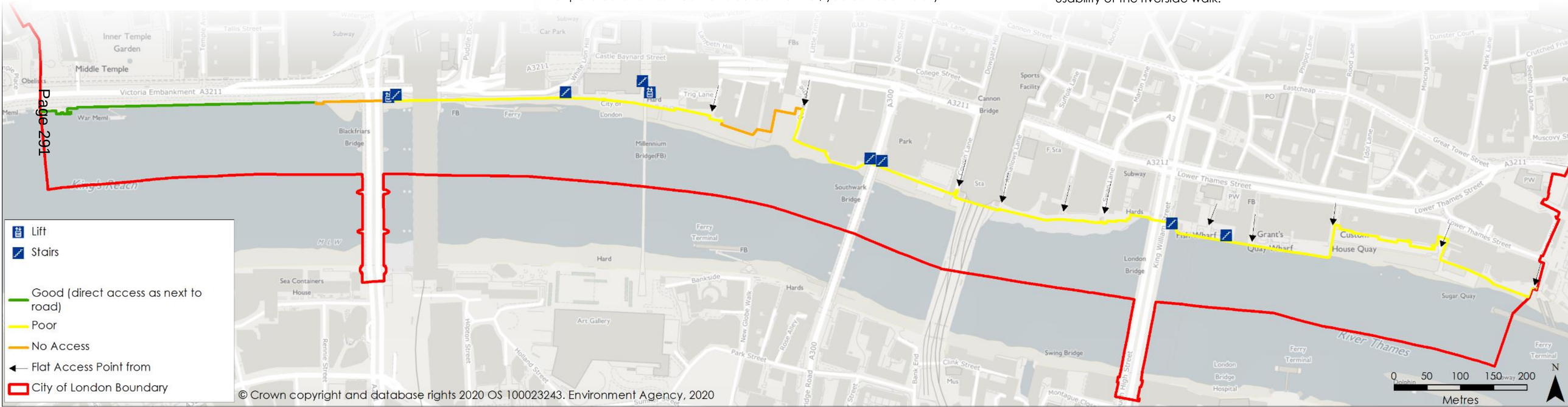
The Thames Path runs almost continuously along the City's Riverside and is an important, low pollution, east-west pedestrian route through the City. Strava, the running and cycling app, shows the City's riverside is almost constantly used by runners at all times of day and throughout the week. 121 interviews show the riverside is liked by runners and walkers as it is wider than most footpaths in London, is not polluted and has nice views across the river, you can see the sky.

How does this impact the Strategy?

Opportunities to increase access to the riverside will only come with development of a site. Every opportunity should be taken through planning to secure better access.

If raising works are to be done by each owner at different times, then there may be issues of wheelchair access between sites if one walkway is higher than next doors.

As an important route in the City, any works to the flood defences may impact the usability of the riverside walk.



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River Safety

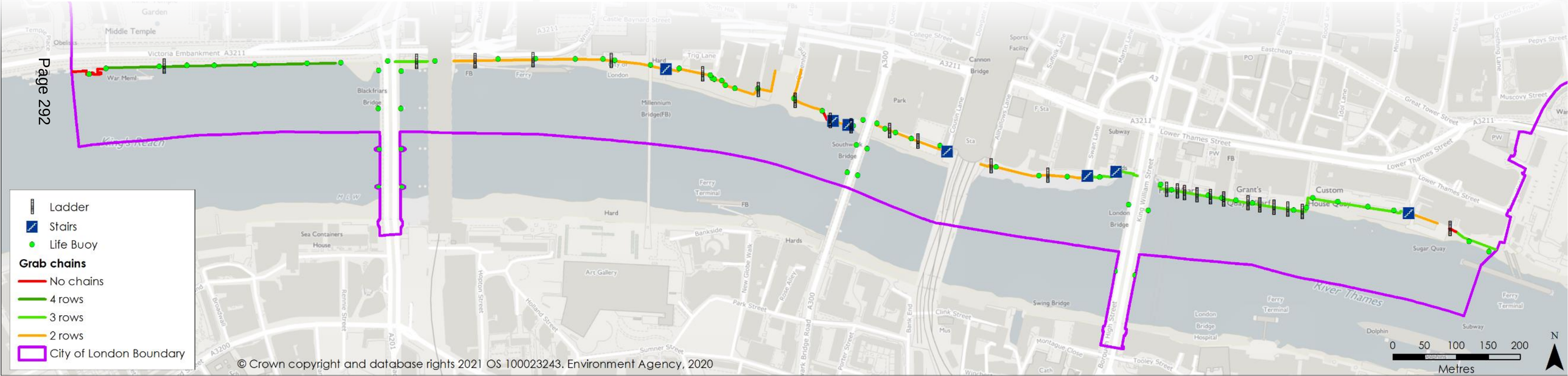
Lifesaving equipment include life buoys and grab chains.

There are also many access points such as stairs and ladders out of the river and foreshore.

The emerging City Plan 2036 Policy s17 Thames Policy Area requires "maintaining and enhancing access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards."

How does this impact the Strategy?

This equipment and access points should be retained and ideally improved upon going forward.



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Natural Capital and Biodiversity

The River Thames is a huge part of the natural capital of the City as a Site of Metropolitan Importance for Nature Conservation.

There are a number of green roofs along the riverside, linking the important river habitat to other natural spaces.

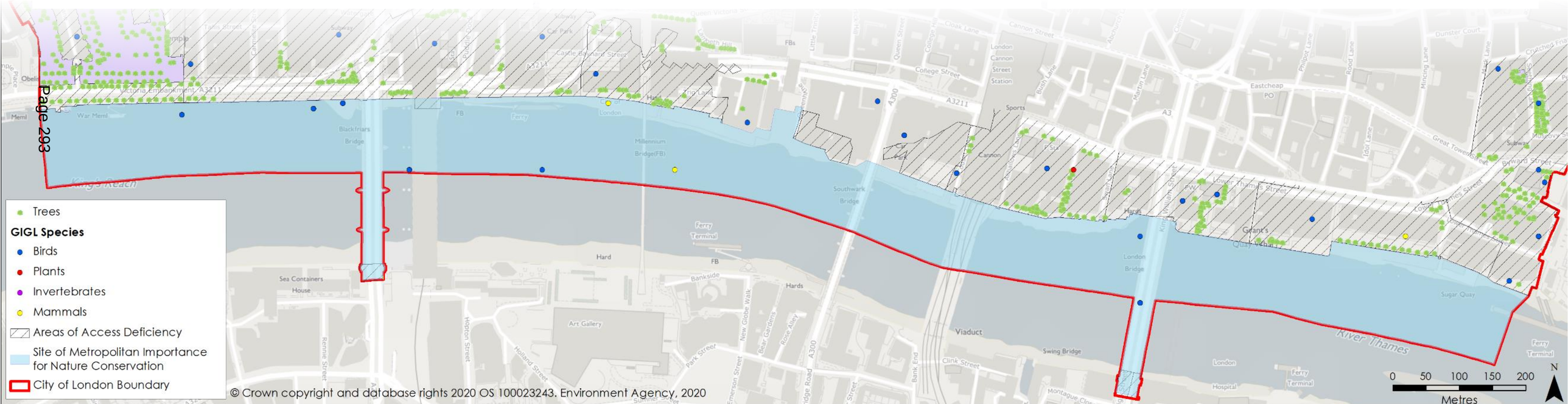
However, the majority of the riverside walk is hardscape, with a few trees dotted along the riverside and a few planting beds.

Read more about biodiversity in the City of the website:
https://www.cityoflondon.gov.uk/things-to-do/city-gardens/target-species

How does this impact the Strategy?

There is huge opportunity to increase natural capital along the riverside. Creating green corridors from the river into the City could increase biodiversity in the whole City.

Going forward, increasing tree shade cover should be prioritized as the riverside is south facing and is going to be a hot area when temperatures rise in line with climate change projections.



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Public Realm Furniture

This map and the map on the next page show bins, benches, bollards and lighting on the riverside.

There are specific design guides and technical manuals on the Public Realm section of the City of London website: https://www.cityoflondon.gov.uk/services/streets/public-realm-and-lighting-design-guidance

Lighting is a consistent feature along the riverside, it is well lit throughout with a lot of the lighting mounted on the flood defence wall.

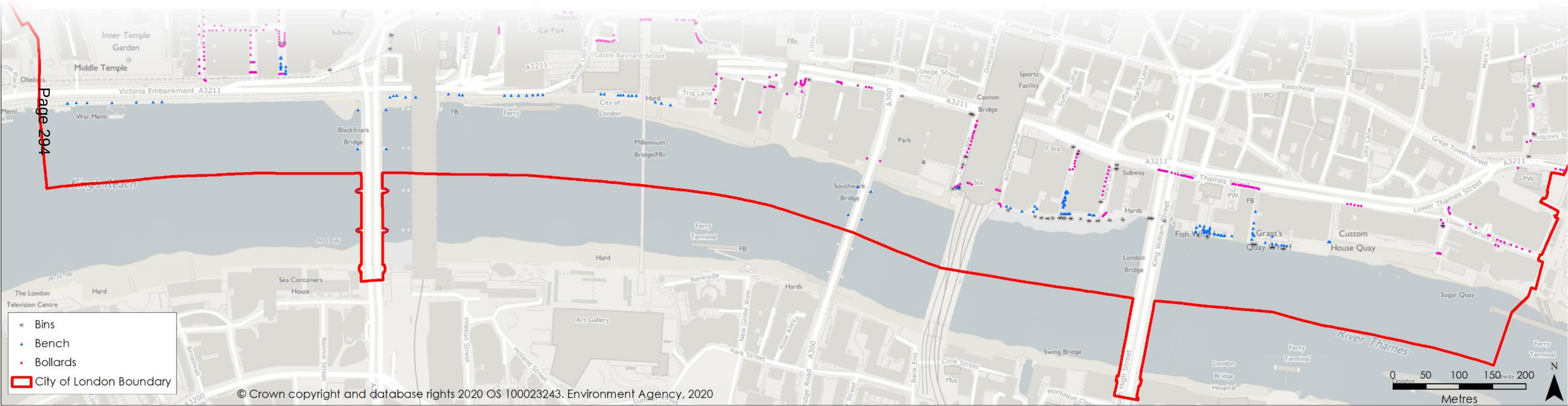
Benches are sporadically spaced along the riverside, some areas have a lot of benches, other having none. This may be due to the width of the riverside walkway being narrow is some areas.

Bins are again sporadically placed along the riverside with a lot in some areas and none in others.

How does this impact the Strategy?

This strategy will allow more useful public realm features to be integrated into the riverside. This will be in line with the City of London's Public Realm guidance.

Lighting may need to be reconsidered as part of the river wall, as it may be difficult to raise lighting columns.



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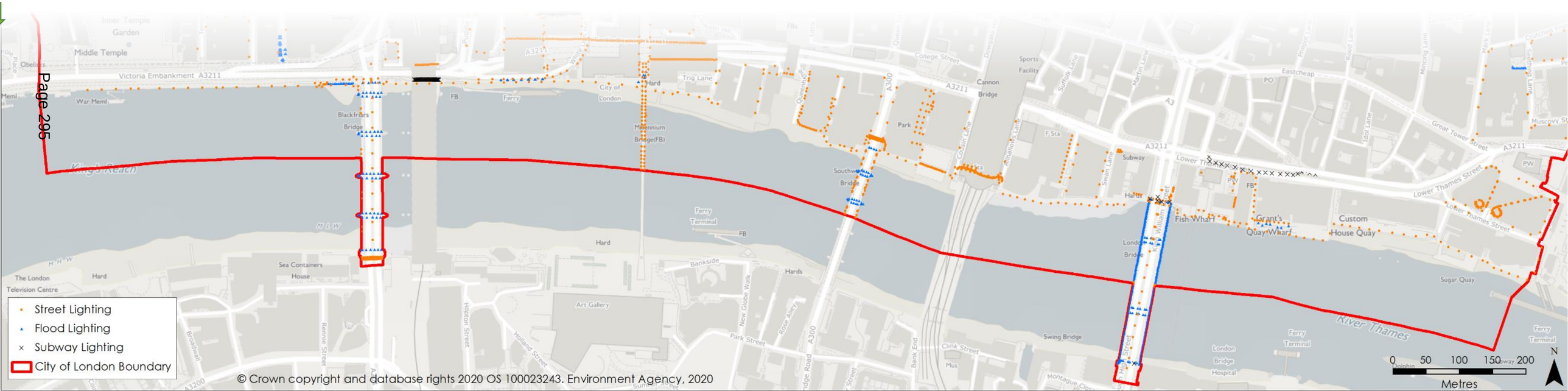
Public Realm Furniture- Lighting



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Committee(s)	**Dated:**
Planning and Transportation	16th November 2021
Subject: Management of Cumulative Construction Impacts	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	2, 10 and 11
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: Executive Director Environment Department	**For Information**
Report author: Bhakti Depala, Development Liaison Manager Rachel Pye, Assistant Director, Public Protection Ian Hughes, Deputy Director Transportation and Public Realm	

Summary

Planning and Transportation committee members requested information on how officers are managing the cumulative impacts of construction works to minimise disruption to residents and nearby occupiers. This report sets out the processes in place which helps to minimise the impacts of construction by collaborative working, use of planning conditions, Planning Performance Agreements (PPAs), Code of Construction and Considerate Contractors Scheme all of which encourage early engagement and consistent dialogue with residents and other neighbouring occupiers.

Recommendation(s)

Members are asked to note this report.

Background

1. The City's economic dynamism means there is a high rate of change and development, and over many years, the City is constantly being redeveloped through deconstruction, construction and refurbishment of its buildings, at any one time there are many active sites within the City. Given the density of the built environment, it is acknowledged that construction works will result in some disruption but there are mechanisms in place to minimise it.

2. In order to facilitate the construction process and manage the construction impacts so that there is minimal disruption to nearby occupiers, officers in the new Environment Department; Planning, Public Protection and Environmental Health, Transport and Highways are working collaboratively to manage and mitigate exposure to unnecessary environmental impacts of construction, whilst ensuring that the City can continue to function as a modern world-class business centre.

3. Planning permissions are issued by the City Corporation with an attached condition that requires the permission to be implemented within a period of either three or five years depending on the developer's indicative programme. An application scheme can be implemented at any time within that time period. Officers are not able to control when a development scheme will be implemented within this timeframe.

4. In 2020 a Development Liaison Manager was appointed, working within the Planning Team but across the City Corporation, whose role is to coordinate the intelligence gathering and act as a single point of contact to facilitate the delivery of development between developers and the various regulatory teams from the time pre-application discussions start to the end of scheme delivery prior to occupation. The role ensures ongoing dialogue between the City and the development team helping to provide solutions to complex development challenges.

Planning Performance Agreements

5. At pre-application and application stage, officers strongly urge applicants to engage with residents and nearby occupiers prior to submitting an application to understand any concerns they may have and front load information regarding the construction programme as much in advance as possible.

6. Since the Development Liaison Manager role was appointed, scheme delivery Planning Performance Agreements (PPA) have been introduced to facilitate the construction of schemes. Once it is realised that a development scheme is due to be implemented, officers are urging applicants to enter into a scheme delivery Planning Performance Agreement (PPA). This allows officers from various departments to have a consistent dialogue with the applicants scheme delivery team (including the demolition and construction contractors) to allow for a more efficient scheme delivery process and avoid unnecessary delays to the construction programme. The PPA comprises regular meetings between the scheme delivery team and officers to understand and foresee the construction programme on the ground which in turn allows officers to urge applicants to liaise regularly with residents and other sensitive neighbouring occupiers in a timely manner to listen to their feedback and carry out construction in a way that minimise impacts to them.

Regular Meetings with Developers and the Officers

7. Officers within the new Environment Department; Planning, Public Protection and Environmental Health and Highways and City Property Advisory Team hold quarterly meetings to discuss the development tracker and to gather and share knowledge and information officers hold on the intelligence of schemes which are about to commence. Environmental Health Officers and Transport officers also hold regular face to face meetings with contractors in advance of (& during) demolition and construction to coordinate schemes (which includes helping to facilitate meetings with residents). These meetings help to ensure sites liaise with each other, with officers in the corporation and are able to together manage the cumulative impacts of construction.

Code of Practice for Deconstruction and Construction

8. In 2019, the City of London produced a Ninth Edition of the Code outlining what constitutes acceptable site practice to manage and mitigate the environmental effects of construction.

9. The Code balances the needs of the Business City (particularly construction sites) to undertake construction works, with the expectations of residents and neighbouring businesses who wish for impacts to be minimised.

10. In tandem a pre commencement planning condition is imposed for major developments requiring a 'Scheme of Protective Works' for construction and demolition sites to be approved by the City Corporation before the development commences. This Scheme of Protective Works is required to be developed in accordance with the requirements and recommendations of the Code and demonstrates how Best Practicable Means (BPM) are to be met to mitigate the effects from noise, dust and vibration. The planning condition then requires the development to be delivered in accordance with the Scheme of Protective Works that has been approved by the City Corporation. In appropriate circumstances this would allow the City Corporation to issue a breach of condition notice requiring compliance in the event of a breach.

11. In addition, we also have powers to serve a Section 60 notice on a contractor for the control of noise and vibration at a site. A Section 60 notice can be served on the contractor for the control of noise and vibration at the site and can specify the plant of machinery that is or is to be used, specify the hours during which work can be carried out; and/or specify the levels of noise and vibration that can be emitted from the site.

12. The Code requires applicants to provide residents and other nearby occupiers sight of draft Scheme of Protective Works and Construction Management Plans before they are submitted to planning for approval, to allow for early engagement and feedback from resident so impacts can be mitigated and amendments to be made, where practicable.

13. The Code covers eight key areas: Community liaison and consultation; Noise; air quality; contaminated land; waste, water; sustainability and light. The revised Code also incorporates proposals for enhanced monitoring including arrangements for contributions to monitoring costs to be made by developers. This is now allowing a specific resource to be deployed to ensure that the

requirements of the Code are met, including liaison, compliance with construction hours and the terms of any out of hours permission are complied with.

14. The Code sets out in detail the flexible approach to noisy works outside of standard construction hours, how these are applied for, how these applications are assessed and monitored. Additional hours may be approved if there is no disturbance likely from the activity, if the works support other City occupiers such as residents, restaurants or places of worship or if there is a safety or engineering justification. Project programme alone is not accepted as a justification for works outside of standard hours.

15. Notifications to local occupiers are approved alongside the detailed application which includes monitoring requirements commensurate with the size of site, nature of works and sensitivity of the location.

16. Site monitoring is undertaken in a variety of ways which may include continuous real time alarmed system with notifications to the City.

17. All approved out of hours works and contractor contact details are displayed on City Maps.

18. A 24/7 noise service operates in the City, the service is very well used, offers a response and a visit within the hour, often sooner. This enables a robust enforcement response using the range of powers available, should any contractor cause a disturbance or operate in outside of the Code's requirements.

19. City occupiers are encouraged to use this service and report any matters of concern to officers on 020 7606 3030.

Considerate Contractor Scheme (CCS)

20. All development sites in the City are expected to join the Considerate Contractor Scheme (CCS) which has been running for over 30 years. The Scheme encourages and promotes the highest of standards for building and civil engineering contractors working in the Square Mile, and over many years has a proven track record in ensuring demolition and construction companies take their responsibilities seriously in terms of minimising disruption to their neighbours and minimising their impacts.

21. The scheme comprises; a Code of Conduct covering planning, site safety, site environment, cleanliness and liaison, with regular inspections and monitoring by City CCS Officers, quarterly reviews, a dedicated telephone hotline and email address for public comments, posters advertising the site's membership of the scheme, and the standards the site is expected to meet. The coveted Environment Award specifically recognises excellence in environmental innovation, an Access Award is awarded for consideration of accessibility issues by the City of London Access Group and a Chairman's Trophy is awarded to the City's best site assessed from a shortlist via a personal site visit from a judging panel, typically led by the Chairman of Streets &

Highway Licensing

22. In addition to the support & acknowledgement of best practice through the CCS, stringent standards are set by the Highways team for various highway licences that developers are required to request from the City as Highway Authority.

23. Although the City is obliged to grant such licences on request in order to allow sites to erect scaffolds & hoardings to facilitate safe working, Highways officers have developed over many years a set of requirements that are intended to maximise the space retained for public use rather than allowing the developer to take the maximum area they might want to undertake their activities.

24. Safety remains the highest priority, and these guidelines have been recognised as some of the most stringent in London by the Health and Safety Executive (HSE). They extend to cover all aspects of site activities that affect the highway & include requirements around parking facilities, mobile cranes, concrete pours, temporary lighting, neighbourhood liaison and accessibility issues to name just some.

25. Taken together, the CCS and the associated required standards for highway licences ensures that the quality of individual developments in the City represent some of the highest in London. Indeed, most major contractors looking to bid for work on developments engage with Highway officers before they tender to ensure their demolition & construction methodologies will be acceptable. Every site is different so a degree of cooperation on both sides is essential to ensuring the activity takes place as safely and quickly as possible with the minimum of disruption.

26. Similarly, to Planning officers, the Highways team are not able to refuse the granting of these licences simply because there are other developments in the vicinity. However, it has been standard practice for many years for Highways officers to organise & chair coordination meetings when there are clusters of sites taking place in close proximity. This ensures that sites collaborate in terms of their programmes and that activities are planned with the intention of minimising their impact on the public. Over many years this active role played by City officers has helped address issues before they escalate, successfully enabling development to take place at Paternoster Square, Aldgate, Moorgate / Liverpool St (including Crossrail) and the City Cluster with a much reduced impact.

27. A pre commencement planning condition is imposed for major developments requiring a Construction Logistics Plans (CLP) to be submitted at an early stage to understand the impact on highways and the public, including scaffold locations, hoarding lines, tower crane operations, loading & unloading points, site accommodation etc. Where possible nearby schemes are asked to coordinate to reduce construction impacts.

28. One area where Highway officers would welcome greater powers is the ability to challenge building sites that overrun their intended duration. To reiterate, the Highways Act 1980 obliges Highway Authorities to grant licences on request, so we are unable to refuse requests for extensions simply because the site is running late. The Traffic Management Act 2004 did include provision for authorities to charge overrun fees in the same way that utilities can be charged for overrunning their works, but regrettably this power has not been enacted by successive Governments despite lobbying by the Transport for London, the City & others.

29. Finally, it should be noted that fees & charges for licences and road closures can only be based on cost recovery to the City and cannot be set to what might be deemed the economic cost & impact of those measures.

Training

30. Officers propose to offer a training session to Members of the Planning and Transportation and Port Health and Environmental Services committees to explain in further detail the application of Code of Construction.

Financial Implications

31. None

Corporate and Strategic Implications

32. The Corporate Plan requires everything we do to meet three aims, to contribute to a flourishing society, to support a thriving economy and to shape outstanding environments.

33. The work supports the delivery of Corporate Plan outcomes 2, 10 and 11:

- Outcome 2 - People enjoy good health and wellbeing
- Outcome 10 - We inspire enterprise, excellence, creativity and collaboration
- Outcome 11 - We have clean air, land and water and a thriving and sustainable natural environment

Conclusion

34. The City Corporation is working actively and collaboratively across departments and closely with the development industry. Mitigation mechanisms are in place namely through planning conditions, encouraging entering into scheme delivery PPAs, regular meetings with the developers construction team, residents and officers in the Environment Department, joining up to Considerate Contractors Scheme (CCS), the Code of Construction Practice and regulatory enforcement when necessary. Officers are continually encouraging applicants to the use of the best environmental options in planning and managing construction and

deconstruction, whilst ensuring the City can continue to function as a modern world class business centre.

Appendices

Code of Practice for Deconstruction and Construction Sites Ninth Edition 2019

Background Papers

Draft Code of Practice for Deconstruction and Construction Sites Eighth Edition 2017

Consultation on Noisy Saturday Construction Work Activities in the City of London November 2018

Construction Levy - Code of Practice for Deconstruction and Construction Sites Ninth Edition 2019

Contact

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Ian Hughes, Deputy Director Transportation and Public Realm
Tel: 07958283363

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Committee(s)	Dated:
Planning & Transportation Committee	16 November 2021
Subject: Business Plan 21/22 – Q2	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	**N/A**
Does this proposal require extra revenue and/or capital spending?	**No**
If so, how much?	**N/A**
What is the source of Funding?	**N/A**
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: Juliemma McLoughlin	**For Information**
Report author: Elisabeth Hannah	

Summary

This report sets out the progress made during Q2 of the 2021/22 Departmental Business Plan. This report continues to build on our new approach to share high level data, awards and results as infographics (Appendix A), you will find further details and additional information at Appendix 2.

At the end of September 2021, the Environment Department was £1.654m (25%) underspent against the local risk budget to date of £6.507m, over all the services managed by the Executive Director Environment within the Planning & Transportation Committee. Appendix B sets out the detailed position for the individual services covered by this department.

Overall the Executive Director Environment is currently forecasting a year end overspend of £719k (6.7%) for her City Fund and Bridge House Estate services.

Recommendation

Members are asked to:

- Note the report and appendices.

Main Report

Background

1. The 2020/21 Business Plan of the Department of the Built Environment was approved by this committee on 26 January 2021.

Current Position

2. Appendix A shows our Infographic approach to presenting departmental high-level data, awards and results. The work of the department continues to support City of London's Corporate Plan and key adopted strategies.
3. The end of Quarter 2 20/21 monitoring position for the Department of Built Environment services within Planning & Transportation Committee is provided at Appendix 2.

Key Updates

4. Response analysis for the City Plan 2036 is continuing. The Mayor of London has objected under conformity with the London Plan on tall buildings policy. Officers are discussing possible amendments and seeking member view on onward progress and timings. There is the potential for longer delay to Plan to reflect the impact of Covid-19 on changing work and development patterns, emerging national policy in the Environment Bill, the Climate Action Strategy, amendments to tall buildings policy and the identification of additional housing capacity.

5. The 10th edition of Sculpture In The City was launched, including 19 sculptures in the public space.

6. Culture Mile branding and wayfinding designs for Phase 2 are being developed following implementation of Phase 1 in August 2021

7. The Moderation and Evaluation process has been completed for the City of London's parking contracts. During this process Lot 6 was dropped from the process, this was due to lack of identified savings and only having one supplier submit (Incumbent). A Parking Tender Award report will be going to committees for decision, with an expectation the supplier(s) will be notified by 11 November 2021, and a go-live date of 1 April 2022. The new contracts will provide for efficiencies in contract management and savings via economies of scale.

Transport Strategy Updates

8. Following the decision being agreed at September's Planning & Transportation committee, the review period for the Transport Strategy has been extended to Spring 2023.

9. A consultancy firm has been selected to carry out the feasibility study for a sustainable logistics centre, with work commencing in quarter 3

10. The Pedestrian Priority Programme combined gateway 3/4/5 report for the first phase schemes at Cheapside, Old Jewry, King Street, King William Street, Threadneedle Street & Old Broad Street (S) was approved by S&W on 12 October. Projects Sub-committee are expected to also approve in October,

allowing detailed design and drafting of the experimental traffic orders to commence.

11. *All Change at Bank* consultation report was approved at S&W in September to proceed to finalisation of design and to advertise the statutory traffic orders. A final approval report is expected in December to move to construction.

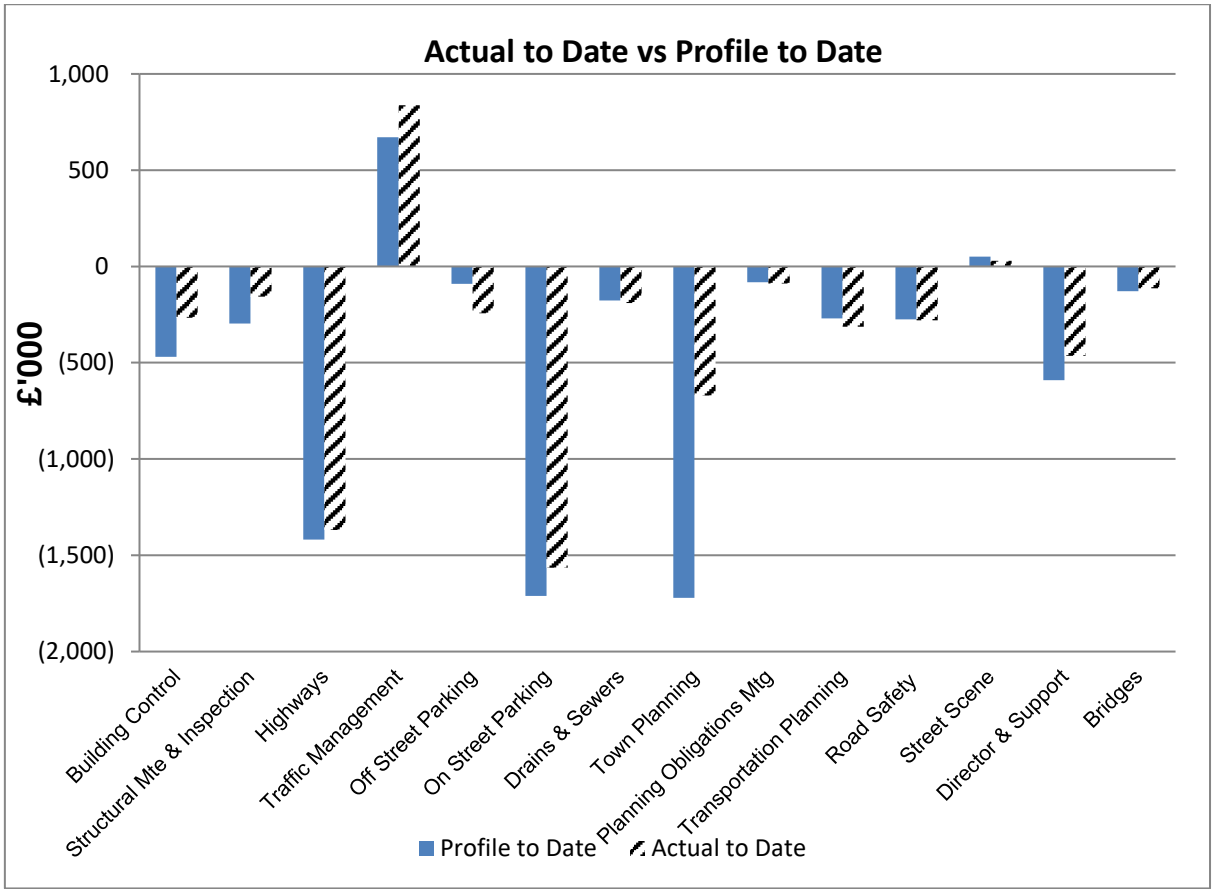
Staff Development

12. Two Level 3 Business Administration apprentices have been recruited in August.

13. The second Institute and Leadership (ILM) programme for staff grades A-C has been launched, this nationally recognised course will give successful candidates not only a recognised award but also build their self-confidence and team skills, the group will also be running a fun and The programme of 12 candidates includes colleagues from DBE, Open Spaces and Markets and Consumer Protection.

Detailed Finance Information

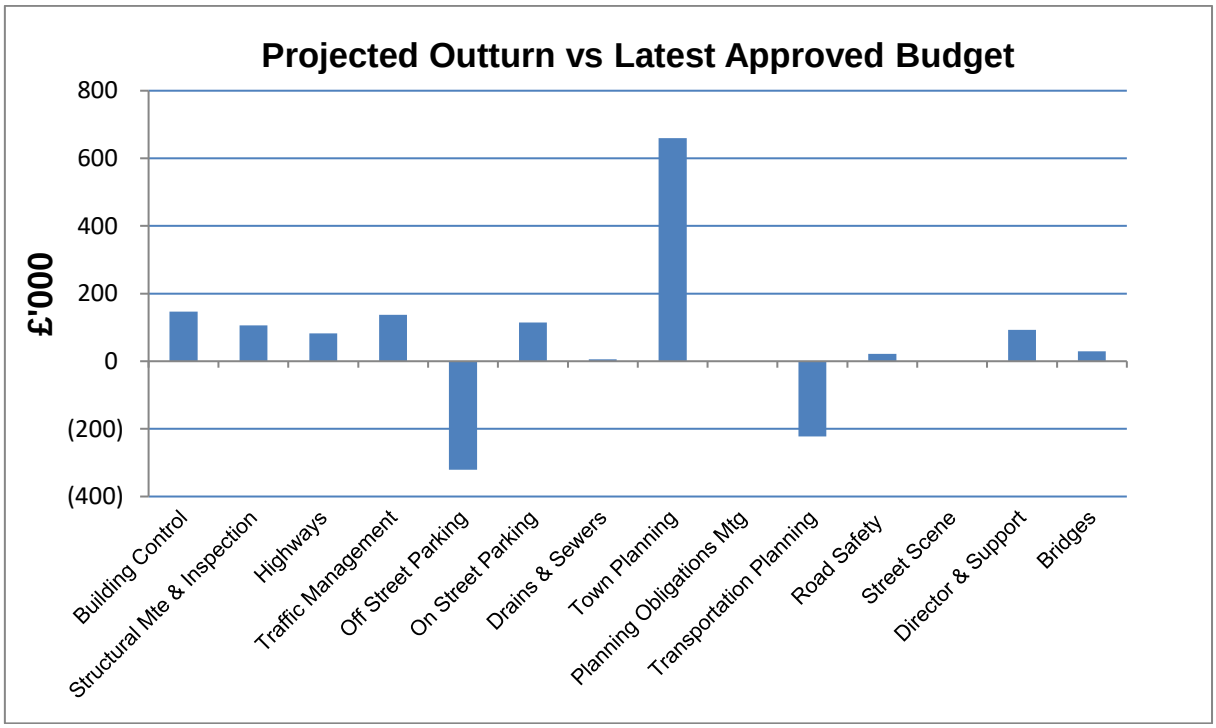
14. The end of September 2021 monitoring position for the Environment Department services within Planning & Transportation Committee is provided at Appendix B. This shows a net underspend to date for the Department of £1.654m (25%) against the overall local risk budget to date of £6.507m for 2021/22.



Notes:

1. Graph shows the actual local risk net position against the profiled budget to date for each Division.
2. A position above the baseline shows overall net income.
3. A position below the baseline shows overall net expenditure.
4. DBE total actual to date net exp of £4.739m is £1.654m under the profiled budget to date of £6.507m.

15. Overall the Executive Director Environment is currently forecasting a year end overspend position of £719k (6.7%) for her City Fund and Bridge House Estate services.



Notes:

1. Zero is the baseline latest approved budget for each Division of Service.
2. Graph shows projected outturn position against the latest approved budget.
3. A variance above the baseline is favourable ie either additional income or reduced expenditure.
4. A variance below the baseline is unfavourable is additional expenditure or reduced income.
5. Overall the Department is forecasting an overspend of £719k at year end.

16. The reasons for the significant budget variations are detailed in Appendix B, which sets out a detailed financial analysis of each individual Division of Service reporting to this Committee, for the services the Executive Director Environment manages.

17. The better than budget position at the end of September 2021 is mainly due to staffing savings due to vacancies held throughout the Department, and additional income from Planning Application fees, Planning Performance Agreements, and the Thames Tideway SLA.

18. These underspends to date are partly offset by reductions in car parking income due to the ongoing impact of COVID-19, under recovery of staff costs recharged to capital projects due to reduced activity as a result of COVID-19 together with current staff vacancies within the Department, and increased variable On-Street Parking enforcement costs.

19. The Executive Director of Environment anticipates that the underspends and overspends to date set out in the preceding paragraphs will largely continue to year end, but that the overall budget position will significantly worsen by year end due mainly to the 12% TOM savings still to be delivered.

20. The projected overspend has reduced by £486k from the position reported at the end of June, and the Executive Director is continuing to review all opportunities to further improve the budget position.

Appendices

- Appendix A – Infographic
- Appendix B – Finance Report

Background Papers
DBE Business Plan 2021/22

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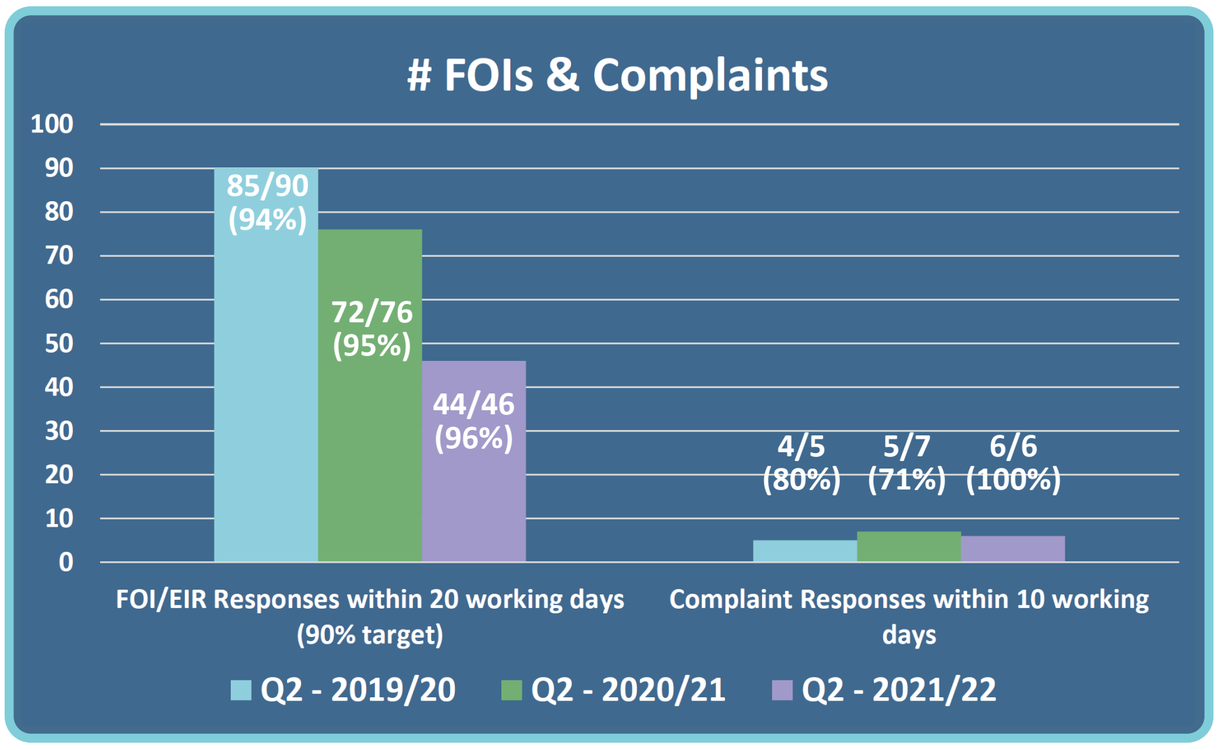


Building Control certified as meeting the Quality Management Standard for the **27th** year

100% completion certificates issued within 10 days

Feasability Study consultancy for a **Sustainability Logistics Centre** work will commence during **Q3**

Building Control performance

100% - Applications processed within 19 days

80% - Applications processed within 26 days

100% - Completion certificates issued within 10 days

Phase 2 branding designs for Cultural Mile being developed following **Phase 1 in August 2021**

4G/5G shared infrastructure deployment expected Q4 2022/23

CON29 property searches returned within 12.5 days

Planning applications determined within agreed timescales:

75% - Major (Target 100%)

95% - Minor (Target 65%)

89% - Other (Target 75%)

Contribute to a **flourishing society**

Shape **outstanding environments**

Department of the Built Environment

Support a **thriving economy**

86% of **SuDS** consultations responded to within **21** working days

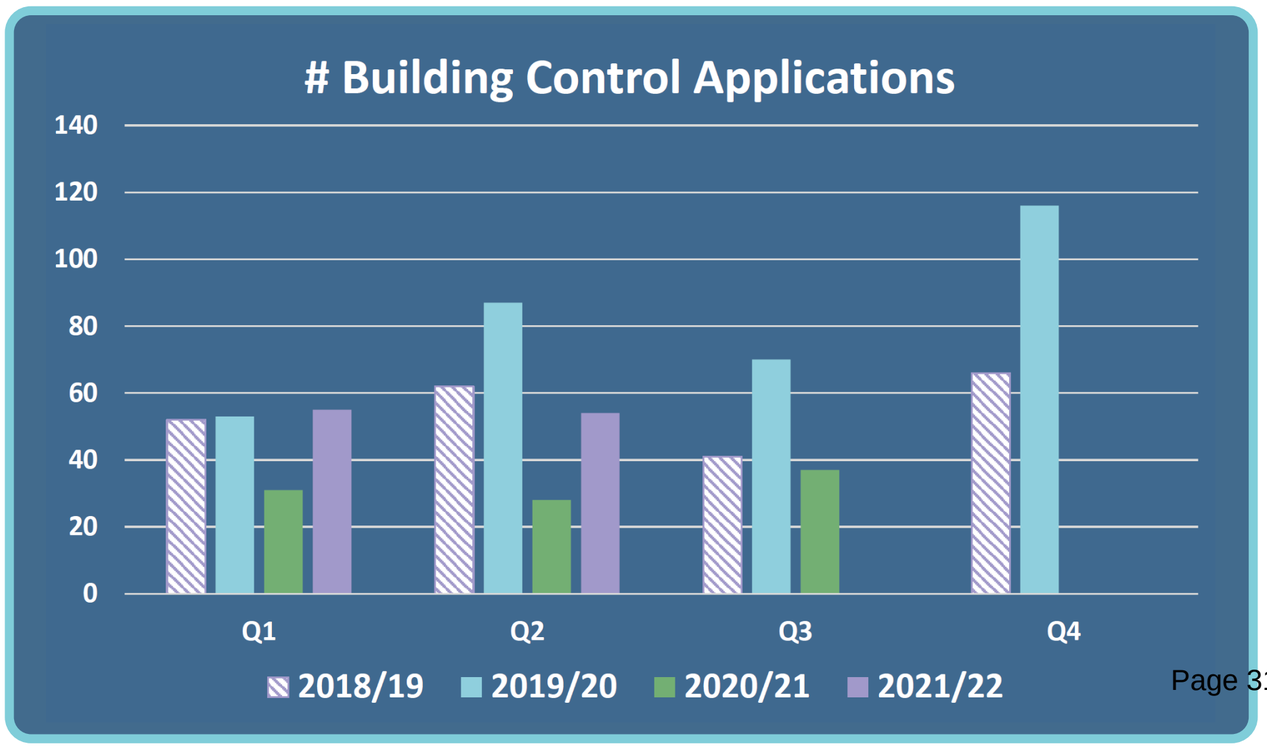
Staff Development: Two new apprentices

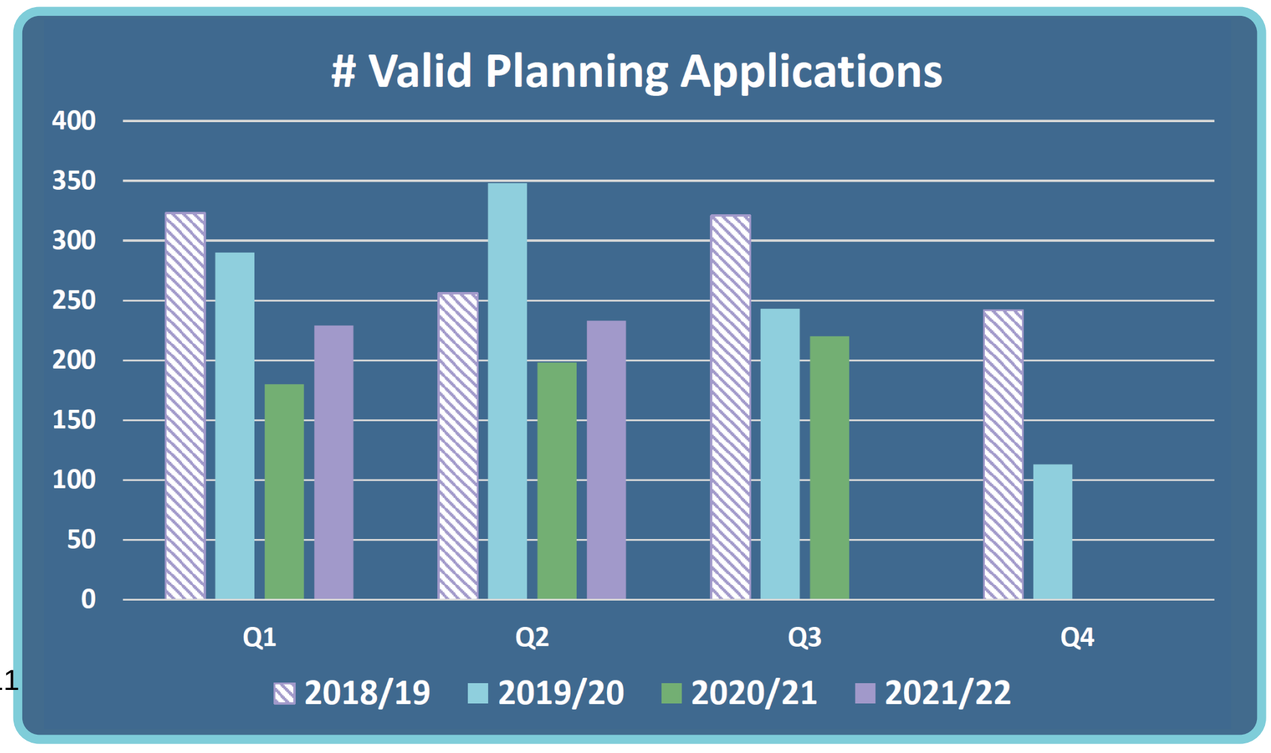
7082 cycle parking spaces secured through planning applications

Public Realm Vision & SPD development enters **Stage 2**

100% of engineering structures inspected in accordance with annual inspection programme

SITC 10th edition launched which includes **19 sculptures** in the **public space**





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Department of Built Environment Local Risk Revenue Budget - 1st April to 30th September 2021
(Expenditure and unfavourable variances are shown in brackets)

Appendix B

	Latest Approved Budget 2021/22 £'000	Budget to Date (Apr-Sep) Gross Expenditure £'000	Budget to Date (Apr-Sep) Gross Income £'000	Budget to Date (Apr-Sep) Net Expenditure £'000	Actual to Date (Apr-Sep) Gross Expenditure £'000	Actual to Date (Apr-Sep) Gross Income £'000	Actual to Date (Apr-Sep) Net Expenditure £'000	Variance Apr-Sep £'000	Forecast for the Year 2021/22 LAB £'000	Forecast for the Year 2021/22 Forecast Outturn £'000	Forecast for the Year 2021/22 Over / (Under) £'000	Notes
Planning & Transportation (City Fund)												
Building Control	(643)	(850)	380	(470)	(749)	483	(266)	204	(643)	(496)	147	1
Structural Maintenance & Inspection	(614)	(306)	10	(296)	(191)	34	(157)	139	(614)	(508)	106	2
Highways	(2,858)	(1,953)	535	(1,418)	(1,811)	443	(1,368)	50	(2,858)	(2,826)	32	3
Traffic Management	987	(487)	1,158	671	(487)	1,325	838	167	987	1,124	137	4
Off Street Parking	466	(1,484)	1,394	(90)	(1,405)	1,161	(244)	(154)	466	145	(321)	5
On Street Parking	(3,669)	(1,714)	3	(1,711)	(1,568)	3	(1,565)	146	(3,669)	(3,554)	115	6
Drains & Sewers	(362)	(301)	125	(176)	(263)	73	(190)	(14)	(362)	(356)	6	
Recoverable Works	0	(375)	375	0	(382)	382	0	0	0	0	0	
Contingency	1,523	0	0	0	0	0	0	0	1,523	0	(1,523)	7
Town Planning	(3,045)	(2,018)	297	(1,721)	(1,680)	1,009	(671)	1,050	(3,045)	(2,385)	660	8
Planning Obligations Monitoring	0	(82)	0	(82)	(88)	0	(88)	(6)	0	0	0	
Transportation Planning	(582)	(1,359)	1,088	(271)	(1,162)	849	(313)	(42)	(582)	(804)	(222)	9
Road Safety	(315)	(234)	(40)	(274)	(240)	(40)	(280)	(6)	(315)	(293)	22	
Street Scene	(70)	(320)	371	51	(378)	408	30	(21)	(70)	(70)	0	
Director & Support	(1,228)	(591)	0	(591)	(465)	0	(465)	126	(1,228)	(1,135)	93	10
	(10,410)	**(12,074)**	**5,696**	**(6,378)**	**(10,869)**	**6,130**	**(4,739)**	**1,639**	**(10,410)**	**(11,158)**	**(748)**	
Planning & Transportation (BHE)												
London Bridge	(87)	(40)	0	(40)	(30)	0	(30)	10	(87)	(69)	18	
Blackfriars Bridge	(60)	(24)	0	(24)	(20)	0	(20)	4	(60)	(54)	6	
Southwark Bridge	(52)	(25)	0	(25)	(22)	0	(22)	3	(52)	(47)	5	
Millennium Bridge	(82)	(40)	0	(40)	(42)	0	(42)	(2)	(82)	(82)	0	
	(281)	**(129)**	**0**	**(129)**	**(114)**	**0**	**(114)**	**15**	**(281)**	**(252)**	**29**	
TOTAL PLANNING & TRANSPORTATION CTTEE	**(10,691)**	**(12,203)**	**5,696**	**(6,507)**	**(10,983)**	**6,130**	**(4,853)**	**1,654**	**(10,691)**	**(11,410)**	**(719)**	

Notes:

1. **Building Control** - projected underspend due to salary underspends.
2. **Structural Maintenance** - projected underspend due to income from Thames Tideway SLA.
3. **Highways** - the projected year end underspend is mainly due to salary underspends due to staff vacancies and energy cost savings. This is partly offset by a shortfall in capital project fees as a result of staff vacancies.
4. **Traffic Management** - the projected year end underspend is mainly due to additional income from Hoarding & Scaffolding Licences, Road Closures and Thames Tideway SLA, together with staff vacancies.
5. **Off Street Parking** - projected overspend due to effects of COVID-19 on car park income. This has been partly offset by reduced variable management contract costs and premises savings.
6. **On Street Parking** - projected underspend due to staff vacancies and reductions on a wide range of running costs, partly offset by an increase in variable contract costs.
7. **Contingency** - projected overspend relates to P&T DBE TOM 12% savings £1.365m and vacancy factor to be achieved for 2021/22.
8. **Town Planning** - projected underspend mainly due to staff vacancies and additional income from Planning Application Fees/Planning Performance Agreements from large planning applications in the pipeline, plus further large additional income from the Thames Tideway Tunnel SLA. This is partly offset by increased advertising costs and savings to be applied as part of the TOM.
9. **Transportation Planning** - projected overspend is mainly due to under recovery of staff costs from capital projects due to staff vacancies, maternity leave and incomplete timesheets. This is partly offset with salary savings due to vacant posts.

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STREETS AND WALKWAYS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Tuesday, 12 October 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 Tuesday, 12 October 2021 at 10.30 am

Present

Members:

Graham Packham (Chairman)
Shravan Joshi (Deputy Chairman)
Randall Anderson
Peter Bennett
Marianne Fredericks
Deputy Jamie Ingham Clark
Christopher Hill (Ex-Officio Member)
Paul Martinelli (Ex-Officio Member)

Officers:

Ian Hughes	-	Environment Department
Leah Coburn	-	Environment Department
Shani Annand-Baron	-	Town Clerk's Department
Kristian Turner	-	Environment Department
Melanie Charalambous	-	Environment Department
Clarisse Tavin	-	Environment Department
Giles Radford	-	Environment Department
Bruce McVean	-	Environment Department
Jayne Moore	-	Town Clerk's Department

1. **APOLOGIES FOR ABSENCE**
   Apologies were received from Deputy Alastair Moss, Oliver Sells QC, William Upton QC, and Christopher Hayward.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
   There were no declarations.

3. **MINUTES**
   A Member noted that minutes were expanding, and asked whether there were more streamlined, efficient ways of recording minutes (including transcripts alongside a record of decisions made). Another Member supported the detail of minutes as an aid to understanding why decisions were made, and another Member asked whether broadcasts could be captioned to improve accessibility.

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The Town Clerk agreed to explore the issue and report back to the meeting.

RESOLVED, that the minutes of the meeting of 10 September 2021 be approved as a true and accurate record of the meeting.

4. **2-6 CANNON STREET PUBLIC REALM IMPROVEMENTS**

The Sub-Committee considered the report '2-6 Cannon Street Public Realm Improvements'.

Members congratulated the Environment Department on the high quality of the garden at 2-6 Cannon St.

A Member asked if the project pre-dated the decision to do ground surveys to avoid discovering unexpected anomalies.

Members heard that ground surveys were carried out when it was thought there might be utilities in the ground, and a full radar survey had not been done in respect of the project as it was a fully pedestrianised area.

A Member asked what action was being taken to ensure delays did not arise and cause problems in future projects, resulting in cost increases.

Members heard that interest is calculated on S278 and S106 deposits which should cover minor delays and some increased costs, though a review of the project's scope would be required in the event of significant delays or issues.

RESOLVED, that the Sub-Committee

1. Revise the remaining project budget of £420,170 as set out in the finance tables of Appendix 3; including any interest accrued, to complete the project in accordance with the Section 106 Agreement
2. Approve the budget adjustment summarised in table 3 of Appendix 3

5. **55 MOORGATE**

The Sub-Committee considered the report of the Environment Department '55 Moorgate Section 278 Public realm and highway improvements'.

A Member asked whether the pedestrianised area was open 24 hours a day, and whether there were any concerns about the area attracting rough sleepers.

Members heard that the passageway is currently open 24 hours a day, and that discussions are ongoing about night-time closure timings.

RESOLVED, that the Sub-Committee

1. Approve the contents of this outcome report
2. Approve the budget adjustment summarised in section 13 and detailed in table 3 of Appendix 3
3. Agree to close this project once the outstanding actions referred to in section 13 are completed and payments made

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6. **100 MINORIES PHASE TWO: PUBLIC REALM ENHANCEMENTS**
The Sub-Committee considered the report of the Director of the Built Environment '100 Minories Phase Two: Public Realm enhancements to Crescent'.

A Member suggested that there was merit in utilising the current developer's expertise where possible, rather than looking elsewhere.

A Member sought clarification on whether there had been a change in developer or whether the change had been in the hotel operator and asked if legal obligations had passed to the developer.

Members heard that the Corporation was working with the new owners of the site.

RESOLVED, that the Sub-Committee

1. Approve the amended scope of the project to include climate resilience measures and note that a final design and cost estimate will be set out at Gateway 4/5.
2. Approve the revised funding strategy as set out in this report to include funding from the Cool Streets and Greening Programme in addition to previously allocated S106 funds.
3. Approve the additional budget of £29,819, funded from the 100 Minories S106 for Phase 2 to reach the next gateway.

7. **BARBICAN AND GOLDEN LANE HEALTHY STREETS PLAN**
The Sub-Committee considered the report of the Director of the Built Environment 'Barbican and Golden Lane Healthy Streets Plan'.

A Member expressed concern that the project appeared to not yet be fully funded.

Members heard that the £250K bid amount had been approved in April 2021 to deliver the plan. A subsequent bid of £2M had been put in to fund those future projects identified through the plan and that there was considerable support for this and subsequent projects. The Sub-Committee noted the financial pressure on projects generally.

A Member asked whether Beech Street was a separate project.

Members heard that a Beech Street report was expected to be presented to the December 2021 session of the Sub-Committee, and that there are a number of well-coordinated workstreams around the Barbican and Beech Street area.

A Member expressed the hope that the environment of the area in general was being considered, the idea being for it to be an inviting place to go.

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The Sub Committee noted that due consideration was being given to the Barbican's listed building status.

Members heard that an extensive engagement period was being planned, and a Member expressed the hope that the very good departmental engagement with stakeholders seen in the Department would continue even with the financial pressures.

A Member sought clarification on whether air quality assessments were being benchmarked.

The Sub-Committee heard that air quality was being modelled with the Cambridge-based company CERC. NOx measurements were benchmarked against data previously gathered in the wider area prior to the pandemic.

RESOLVED, that the Sub-Committee

1. Approve a budget of £141k to reach the next Gateway
2. Delegate authority to the Executive Director Environment, in consultation with the Chamberlain, to make any adjustments between elements of the approved budget, provided the total approved budget £141k is not exceeded
3. Note the total estimated cost of the project at £250k (excluding risk).

8. **PEDESTRIAN PRIORITY PROGRAMME - PHASE ONE INTERVENTIONS**

The Sub-Committee considered the report of the Executive Director Environment, 'Pedestrian Priority Programme – Phase One Interventions'.

The Sub-Committee pointed out that there needed to be a clear maintenance plan for planters and parklets.

Members heard that the cost shown was planned for an 18-month period (to the end of the experimental phase) with a second round of enhancement funding expected at the conclusion of that period to include such maintenance.

A Member congratulated the department on the rapid and efficient handling of an issue with loose paving on Poultry and commented that appropriate maintenance procedures needed to be factored into all temporary pavement plans.

A Member commented that signage around Old Jewry was confusing to minicab drivers causing some to mount the pavement at night, and the Sub-Committee heard that the No Exit signs there appeared to be missing.

The Sub-Committee heard that the signage matter was to be raised with the maintenance team, that planters would be positioned to give a stronger visual signal to drivers. Mapping companies were also to be reminded of the one-way rule.

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RESOLVED, that the Sub-Committee

1. Approve the Phase 1 interventions, as per Option 2, set out in the main body of this report.
2. Approve a sum of £2,402,628 as the implementation budget for the Year 1 (Phase 1) interventions, funded from within the existing Year 1 budget envelope of £2.5 to £3.2million
3. Delegate authority to the Executive Director Environment, in consultation with the Chamberlain, to make any adjustments between elements of the approved budget, provided the total approved budget £~2.4M is not exceeded.
4. Delegate authority to the Executive Director Environment, in consultation with the Chairman and Deputy Chairman of Streets and Walkways, to make proportionate adjustments to the designs of the recommended Option.

9. **STREET LIGHTING LED PROJECT**

The Sub Committee considered the report of the Director of the Built Environment 'Street Lighting LED project'.

A Member asked whether TfL has been persuaded to upgrade the lighting on the red routes.

Members heard that TfL were considering renewing their street lighting assets.

RESOLVED, that the Sub Committee

1. Note the contents of the report and authorise the closure of the project, with any unused balances returned to the on-street parking account
2. Note that the project was delivered on time and to budget

10. **TFA EQUAL PAVEMENTS PLEDGE**

RESOLVED, that the Sub-Committee approve the City of London Corporation's commitment to Transport for All's Equal Pavements Pledge.

11. **TFL BISHOPSGATE EXPERIMENTAL CLOSURE**

The Sub-Committee received the report of the Executive Director Environment 'TfL's Bishopsgate Experimental Closure'.

A Member asked for clarification around where the responsibility lay for mitigations.

Members heard that dialogue with TfL was ongoing during the experimental phase and there was a range of factors to be taken into account.

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A Member commented that the Bishopsgate area was a more pleasant and safe environment and suggested that the extended pavements' use along Gracehurch St be clearly signalled. Another Member drew attention to TfL's adoption of Bishopsgate as a strategic highway and commented that it would impact on local roads in the City, referring particularly to paragraph 11 of the report. Members noted that Bishopsgate was strategic from the point of view of cyclists, pedestrians and public transport providers, and was heavily used by those groups of users particularly with the imminent arrival of Crossrail within the next year.

Members noted the report and noted that a further report will be brought to consider if the City Corporation should object to and/or make other representations in respect of the ETO being made permanent, in its current or modified form.

12. **MIDDLESEX STREET AREA PHASE B NEW OPEN SPACE**
The Sub-Committee received the report of the Director of the Built Environment 'Middlesex Street Area Phase B New Open Space'.

RESOLVED, that the report be noted.

13. **OUTSTANDING REFERENCES**
The Sub-Committee received the list of outstanding references.

Dockless vehicles: Members noted ongoing problems with inappropriate use and parking of dockless bikes and scooters, and that civil enforcement officers and road sweepers could be more actively involved in reporting misuse. Members noted that the penalty for inappropriate parking might need to be increased. Operators are reminded of the expectations around encouraging appropriate use and are to be encouraged to sign up to the Equal Pavements Pledge. Members were advised that an update would be forthcoming on when more providers would be invited to be involved. Members heard that it was clear to users where scooters could be used and docked.

RESOLVED, that the outstanding references be noted.

14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
There were no questions.

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
No other business was raised.

16. **EXCLUSION OF THE PUBLIC**
Members agreed to exclude the public.

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The meeting ended at 12.10 pm

Chairman

Contact Officer: Jayne Moore
tel. no.: 020 7332 1480
Jayne.Moore@cityoflondon.gov.uk

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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	**Daylight/Sunlight – Alternative Guidelines** **Chief Planning Officer and Development Director** A Member argued that the Committee should separate out the desire for Member training and the desire for alternative guidelines on daylight/sunlight and requested that a report be brought to Committee setting out how the City of London Corporation might go about creating alternative guidelines, including timescales, if Members were so minded and the legal implications of this.	**UPDATE (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 26 Oct 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 26 Oct 2021	**<u>Radiance Studies</u>** **Chief Planning Officer and Development Director** 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. 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.	**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. **To be completed: Further report to Committee setting out/providing updates on these points by Winter 2021.**
2	18 June 2019 9 July 2019 30 July 2019 10 Sept 2019 1 Oct 2019 22 Oct 2019 5 Nov 2019	**<u>Construction Works</u>** **Chief Planning Officer and Development Director** A Member referred to the many construction sites within her Ward that were causing	**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,.

	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 30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021 26 Oct 2021	noise/disturbance issues. She asked if officers could look at how this matter might be improved and more effectively controlled and questioned whether any restrictions could be placed on construction when applications were first approved/granted consent. 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'.	**To be completed: November 2021**
3	6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2020 15 Dec 2020	**<u>Member Training</u>** **Chief Planning Officer and Development Director / Director of the Built Environment** 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	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. **To be completed: Training offering for new Members to be considered in 2021 with a view**

	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 26 Oct 2021	authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training. 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.	**to implementing this for the new municipal year.**
4	23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2021 15 Dec 2021 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021 26 Oct 2021	**Barbican and Golden Lane Conservation Area SPD** **Chief Planning Officer and Development Director** A Member highlighted that a Conservation Management Plan was still awaited for this area in the form of a Supplementary Planning Document. He added that this was originally approved by this Committee in October 2018 and that he had requested an update on progress on several occasions since. He asked that this also now be included within the list of Outstanding Actions so that it was not lost sight of entirely.	**UPDATE (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. The Chair stressed the need for and importance of proper consultation on this piece of work. **To be completed: Amended draft document to Committee for final approval by February 2022.**

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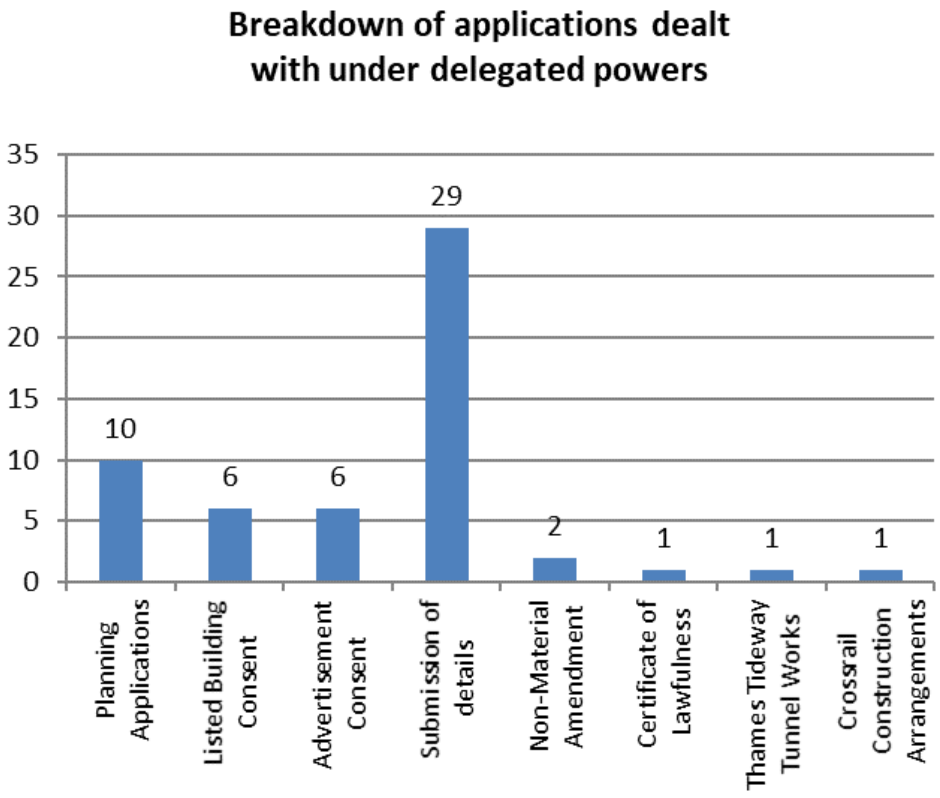
Committee(s)	**Dated:**
Planning and Transportation	16th November 2021
Subject: Delegated decisions of the Chief Planning Officer and Development Director	**Public**
Report of: Chief Planning Officer and Development Director	**For Information**

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 Fifty Six (56) matters have been dealt with under delegated powers. Six (6) relate to works to Listed Buildings, Six (6) applications for Advertisement Consent, Twenty Nine (29) relate to conditions of previously approved schemes, Two (2) applications for Non-Material Amendments, One (1) Certificate of Lawfulness application, One (1) Thames Tideway Tunnel works application and One (1) Crossrail construction arrangement.

Ten (10) Full applications for development have been approved including One (1) change of use and 902sq.m of created floorspace.



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
21/00558/MDC Aldersgate	Thomas More Car Park Barbican London EC2Y 8BT	Submission of Environmental Noise Survey and Plant Noise Assessment report pursuant to conditions 3 and 4 of the planning permission reference 19/01045/FULL dated 28.01.2020.	Approved 26.10.2021	City of London Corporation
21/00583/ADVT Aldersgate	97 Aldersgate Street London EC1A 4JR	Installation and display of i) one fascia sign measuring 14.50m wide by 0.49m high, with halo illumination to the lettering only; and ii) one projecting sign measuring 0.60m by 0.60m, at a height of 2.75m above the pavement, with internal illumination to the lettering only.	Approved 28.10.2021	Nuffield Health
21/00584/ADVT Aldersgate	100 Aldersgate Street London EC1A 4LX	Installation and display of one projecting sign measuring 0.6m (w) by 0.6m (h), at a height of 2.75m above the pavement, with internal illuminations to the lettering only.	Approved 28.10.2021	Nuffield Health

21/00723/LDC Aldgate	19 - 21 Billiter Street London EC3M 2RY	Submission of details of the dismantling of the central staircase to include a method statement for the identification, safe and secure storage of all salvaged materials and alterations to the central staircase to include details of the proposed new balustrades pursuant to condition 4 (j) of listed building consent dated 24th August 2021 (21/00506/LBC).	Approved 26.10.2021	Vanquish Properties UK Ltd
21/00678/FULL Bassishaw	2 London Wall Place London EC2Y 5AU	Change of use of the first floor of 2 London Wall Place from Class A3 restaurant to offices within Use Class E (902m2 GIA).	Approved 12.10.2021	Two London Wall Place Limited
21/00252/FULL Bishopsgate	1 - 3 Widegate Street London E1 7HP	Alterations to shopfront including the installation of new doors and retractable awnings.	Approved 19.10.2021	Marugame Udon (Europe) Ltd
21/00253/ADVT Bishopsgate	1 - 3 Widegate Street London E1 7HP	Express consent is sought for the installation and display of four externally illuminated fascia signs measuring: (i) 0.35 high by 2.91m wide at a height above ground of 3.3m; (ii) 0.39m high by 3.24m wide at a height above ground of 3.55m; (iii) 0.35m high by 2.91m wide at a height above ground of 3.5m; (iv) 0.35m high by 2.91m	Approved 19.10.2021	Marugame Udon (Europe) Ltd

		wide at a height above ground of 3.5m and three externally illuminated projecting signs measuring: (v) 0.6m high by 0.8m wide by 0.1m deep at a height above ground of 3.422m; (vi) 0.6m high by 0.8m wide by 0.1m deep at a height above ground of 3.422m; (vii) 0.6m high by 0.8m by 0.1m deep at a height above ground of 3.422m.		
21/00379/ADVT Bishopsgate	Lamp Column On Bishopsgate North of Junction With Artillery Lane, Outside 220 - 226 Bishopsgate London EC2M 4PT	Installation and display of one non-illuminated banner on lamp column in central reservation on Bishopsgate, north of junction with Artillery Lane, measuring 2m high, 0.785m wide, at a height above ground of 5m.	Approved 21.10.2021	City of London Corporation
21/00549/FULL Bishopsgate	Brushfield House 12 Brushfield Street London E1 6AN	Proposed mansard upward extension with 2no. dormer windows and associated raising of party wall in brick; terrace atop new mansard with new stair enclosure, green roof, decking and railings; proposed brick extension to rear at roof level behind existing butterfly roof form; replacement of all existing timber sash	Approved 14.10.2021	Mediatel

		windows with double glazing to match; new double glazed timer framed shopfront for commercial unit at ground floor with separate office entrance; replacement 4no. Mechanical plant units to the rear at first floor level; metal balconies to third and fourth floors to rear elevation; lowering of existing basement level by circa 910mm; facade cleaning; and other associated works.		
21/00698/FULL Bishopsgate	Open Space And Events Area Broadgate Circle London	Proposed use of Broadgate Circle for a temporary Christmas forest installation with pergola, seating and ancillary facilities.	Approved 14.10.2021	Exchange Square Management Limited
21/00708/MDC Bridge And Bridge Without	Fishmongers' Hall London Bridge London EC4R 9EL	Submission of details for a scheme for how mechanical plant shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building pursuant to condition 4 of planning permission ref. 20/00912/FULL.	Approved 14.10.2021	Fishmongers' Company
21/00604/MDC Broad Street	1 - 14 Liverpool Street And 11-12 Blomfield Street London	Submission of details of a site survey and survey of highway and other land at the perimeter of the site pursuant to condition 2 of planning	Approved 12.10.2021	Aviva Life And Pensions UK Ltd

	EC2M 7AW	permission dated 08/07/2021 (app. no. 19/00466/FULEIA).		
21/00711/MDC Broad Street	Token House 14 - 18 Copthall Avenue London EC2R 7BN	Submission of details pursuant to Condition 30 of planning permission 21/00155/FULL, dated 01/07/2021, relating to a Highways Schedule of Condition.	Approved 12.10.2021	Digitalis Properties
21/00712/MDC Candlewick	Sherborne House 119 - 121 Cannon Street London EC4N 5AT	Submission of an Air Quality Report pursuant to Condition 6 of planning permission ref. 18/01370/FULL approved on 7 March 2019.	Approved 14.10.2021	UK Properties Specialist Ltd
21/00736/MDC Candlewick	68 King William Street London EC4N 7HR	Submission of details of the plant proposed at tenth floor level pursuant to condition 11 and details of extraction and ventilation pursuant to condition 12 of planning permission dated 30 June 2020 (20/00802/FULL).	Approved 21.10.2021	King William Street Limited
21/00661/FULL Castle Baynard	5 - 6 Crane Court London EC4A 2EJ	Removal of external mechanical plant equipment and replacement equipment provided on the main roof of 6 Crane Court and the lightwell of 5 Crane Court, and alterations to the existing plant room within the lightwell of 5 Crane Court including new flat roof and provision of a new terrace area.	Approved 21.10.2021	Red Lion Chambers

21/00662/LBC Castle Baynard	5 - 6 Crane Court London EC4A 2EJ	External works comprise the removal of external mechanical plant equipment and replacement equipment provided on the main roof of 6 Crane Court and the lightwell of 5 Crane Court; alterations to the existing plant room within the lightwell of 5 Crane Court including new flat roof and provision of new terrace area; removal of external railing to 5 Crane Court lightwell; and minor works to external facades to include decorations to render, windows and doors for maintenance purposes. Internal works comprise the replacement of mechanical and electrical services throughout the building; strip out of 1996 refurbishment works including removal of internal partition walls; instillation of internal partitioning and increasing width of one structural door opening; and general refurbishment works including new decorations, floor finishes and WCs fit-out.	Approved 21.10.2021	Red Lion Chambers

21/00682/MDC Castle Baynard	Northcliffe House 26-30 Tudor Street, 16-22 Bouverie Street London EC4Y 0AY	Submission of a Demolition Logistics Plan, Construction Logistic Plan, Construction Environmental Management Plan and Demolition Environmental Management Plan pursuant to conditions 2, 3, 5 and 9 of planning permission dated 04.08.2021 (REF: 20/00581/FULMAJ).	Approved 26.10.2021	DWS Grundbesitz GmbH
21/00686/MDC Castle Baynard	Northcliffe House 26-30 Tudor Street, 16-22 Bouverie Street London EC4Y 0AY	Submission of a circular economy statement required by condition 4 of the planning permission 20/00581/FULMAJ dated 04/08/2021.	Approved 19.10.2021	DWS Grundbesitz GmbH
21/00704/CLEUD Castle Baynard	8 - 12 New Bridge Street London EC4V 6AL	Certificate of lawful existing use or development to determine whether the works so far carried out constitute the lawful implementation of planning permission 14/00254/FULMAJ dated 2nd April 2015	Grant Certificate of Lawful Development 19.10.2021	City of London Corporation
21/00733/PODC Castle Baynard	Northcliffe House 26-30 Tudor Street, 16-22 Bouverie Street London EC4Y 0AY	Submission of the Local Procurement Strategy and the Local Training, Skills and Job Brokerage Strategy pursuant to Schedule 3 Paragraphs 2.1 and 3.1 of the Section 106 Agreement dated 04 August 2021 (Planning Application Reference 20/00581/FULMAJ).	Approved 21.10.2021	DWS Grundbesitz GmbH

21/00710/MDC Castle Baynard	Northcliffe House 26-30 Tudor Street, 16-22 Bouverie Street London EC4Y 0AY	Submission of a details of green roofs and measure to prevent flooding pursuant to Condition 8 parts (a) and (c) of planning permission dated 04.08.2021 (REF: 20/00581/FULMAJ).	Approved 14.10.2021	DWS Grundbesitz GmbH
21/00770/TTT Castle Baynard	Tideway Working Area Blackfriars Bridge Foreshore Victoria Embankment London EC4Y 0DR	Partial discharge of schedule 3 requirements relating to the appearance of hoarding pursuant to BLABF 1 of the Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 as amended.	Approved 14.10.2021	Bazalgette Tunnel Limited
21/00148/MDC Cheap	Dauntsey House 4A & 4B Frederick's Place London EC2R 8AB	Submission of details of sewer vents and details of rainwater collection, harvesting and grey water recycling systems pursuant to conditions 9 and 16 of planning permission dated 14/05/2020 (app. no. 17/01057/FULMAJ).	Approved 12.10.2021	The Mercers' Company
21/00195/MDC Cheap	Dauntsey House 4A & 4B Frederick's Place London EC2R 8AB	Submission of a Construction Management Plan pursuant to conditions 6, 7 and 8 of planning permission dated 14/05/2020 (app. no. 17/01057/FULMAJ).	Approved 12.10.2021	The Mercers' Company

21/00238/MDC Cheap	5 Frederick's Place London EC2R 8AB	Submission of a construction management plan and a construction logistics plan pursuant to conditions 2 and 3 of planning permission dated 22/10/2020 (app. no. 20/00538/FULL).	Approved 12.10.2021	The Mercers' Company
21/00601/MDC Cheap	81 Newgate Street London EC1A 7AJ	Submission of a feasibility study and details of the survey of the ground works and the locations for seven replacement trees to ensure that the new trees are deliverable pursuant to condition 52 (in part) of planning permission dated 11 September 2020 (20/00311/FULMAJ).	Approved 12.10.2021	NG Devon Limited
21/00689/MDC Cheap	2 Gresham Street London EC2V 7QP	Details of an external noise survey pursuant to condition 3(b) of planning permission 19/00772/FULL dated 05/11/19.	Approved 28.10.2021	Willmott Dixon Interiors
21/00771/MDC Cheap	St Lawrence Jewry Next Guildhall Church Guildhall Yard London EC2V 5AA	Details of cleaning trials and mortar samples pursuant to condition 4 of planning permission dated (application number 20/00172/FULL)	Approved 14.10.2021	Julian Harrap Architects LLP

21/00055/MDC Coleman Street	21 Moorfields London EC2Y 9AE	Submission of details of typical bays, stonework, ground floor and podium level elevations, junctions with adjoining premises, soffits, hand rails and balustrades, ground level surfaces and materials, external surfaces within the site boundary, and a landscaping scheme pursuant to conditions 19(c), (d), (e), (f), (g), (i), (j), and 26 of planning permission dated 04/05/2018 (app. no. 17/01095/FULEIA).	Approved 19.10.2021	LS 21 Moorfields Development Management
21/00762/MDC Coleman Street	1 London Wall Buildings London Wall London EC2M 5PG	Submission of details of Geotechnical Site Investigation and archaeological recording pursuant to condition 11 of planning permission dated 24 September 2020 (application number 19/01345/FULMAJ)	Approved 21.10.2021	AG EL LWB BV
21/00787/MDC Coleman Street	63 - 66 Coleman Street & 35 - 39 Moorgate London EC2R 5BX	Submission of details of a topographical site survey pursuant to condition 8 of planning permission dated 01/12/2020 (app. no. 16/01010/FULL).	Approved 12.10.2021	CLI-DARTRIVER
21/00586/MDC Cornhill	19 Old Broad Street London EC2N 1DS	Submission of details of plant mountings pursuant to condition 8 of planning permission dated 08/11/2018 (app. no. 18/00902/FULL).	Approved 19.10.2021	City of London Club

21/00784/MDC Cornhill	19 Old Broad Street London EC2N 1DS	Submission of details of an acoustic report pursuant to condition 7 of planning permission dated 08/11/2018 (app. no. 18/00902/FULL).	Approved 19.10.2021	City of London Club
21/00636/FULL Cripplegate	20 Goswell Road London EC1M 7AA	Installation of an external air-conditioning unit at basement level.	Approved 14.10.2021	Mr. K W Lam
21/00637/LBC Cripplegate	20 Goswell Road London EC1M 7AA	Installation of an air-conditioning system with an external unit located at basement car park level and an internal unit at ground floor level.	Approved 14.10.2021	Mr. K W Lam
21/00718/LBC Cripplegate	37 Andrewes House Barbican London EC2Y 8AX	Removal of existing sliding wall panels in living room and replacement with modern sliding wall panels.	Approved 12.10.2021	Afroditi Stathopoulou
21/00724/LBC Cripplegate	502 Gilbert House Barbican London EC2Y 8BD	Internal refurbishments including removal of L-shaped section of non-structural wall separating kitchen from the living/dining room. Replacement of 1no. internal door off entrance hall to corridor to make full height.	Approved 21.10.2021	Mr Hugo Frederick William Leatt
21/00439/MDC Farringdon Within	New Bridge Street House 30 - 34 New Bridge Street London EC4V 6BJ	Submission of a Construction Management, Environmental and Logistics Plan and a Scheme of Protective Works Management Plan pursuant to conditions 2 and 3 of	Approved 21.10.2021	City of London Corporation

		planning permission 20/00560/FULL, dated 13 November 2020.		
21/00545/FULL Farringdon Within	Fleet Place House 2 Fleet Place London EC4M 7RF	Alterations and extension of existing building to include removal and replacement of the main entrance doors on the front elevation, change of colour of the existing exoskeleton, over cladding of the granite plinths at ground floor, upgraded lighting to the ground floor under croft and a single storey extension to the reception at ground floor level.	Approved 19.10.2021	Heron Trustees 1 & 2 Ltd As Trustees of The Unit
21/00546/ADVT Farringdon Within	Fleet Place House 2 Fleet Place London EC4M 7RF	Installation and display of 1 illuminated sign measuring approximately 3.75m high by 5.55m wide, at ground floor level.	Approved 19.10.2021	Heron Trustees 1 & 2 Ltd As Trustees of The Unit
21/00571/FULL Farringdon Within	2 King Edward Street London EC1A 1HQ	Demolition of twin walkway bridges linking the West and Main buildings with associated alterations to building fenestrations and ground floor layout to West Building, and installation of generator at roof level.	Approved 26.10.2021	Bank of America

21/00722/NMA Farringdon Within	Stonecutter Court 1 Stonecutter Street London EC4A 4TR	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 18/00878/FULMAJ dated 28th March 2019 to remove condition 20.	Approved 21.10.2021	Stonecutter Court Unit Trust
21/00817/PODC Farringdon Within	150 Aldersgate Street 3-4 Bartholomew Place London EC1A	Submission of the Highways Schedule of Condition Survey pursuant to Schedule 3 Paragraph 6.1 of the Section 106 Agreement dated 21 May 2021 (Planning Application Reference 20/00371/FULMAJ).	Approved 14.10.2021	Gerald Eve LLP
21/00819/PODC Farringdon Within	150 Aldersgate Street 3-4 Bartholomew Place London EC1A	Submission of the Local Procurement Strategy (Demolition) pursuant to Schedule 3 Paragraph 2.1 of the Section 106 Agreement dated 21 May 2021 (Planning Application Reference 20/00371/FULMAJ).	Approved 14.10.2021	Gerald Eve LLP
21/00820/PODC Farringdon Within	11 Pilgrim Street London EC4V 6RN	Submission of the Highways Schedule of Condition Survey pursuant to Schedule 3 Paragraph 6.1 of the Section 106 Agreement dated 29 July 2021 (Planning Application Reference 20/00870/FULL).	Approved 19.10.2021	Gerald Eve LLP

21/00821/PODC Farringdon Within	11 Pilgrim Street London EC4V 6RN	Submission of the Local Training Skills and Job Brokerage Strategy (Demolition) pursuant to Schedule 3 Paragraph 3.3 of the Section 106 Agreement dated 29 July 2021 (Planning Application Reference 20/00870/FULL).	Approved 21.10.2021	Gerald Eve LLP
21/00822/PODC Farringdon Within	11 Pilgrim Street London EC4V 6RN	Submission of the Local Procurement Strategy (Demolition) pursuant to Schedule 3 Paragraph 2.1 of the Section 106 Agreement dated 29 July 2021 (Planning Application Reference 20/00870/FULL).	Approved 14.10.2021	Gerald Eve LLP
21/00631/FULL Farringdon Without	Middle Temple Hall Middle Temple Lane London EC4Y 9AT	Formation of new fire escape stair to Middle Temple Hall, including formation of fire lobby at lower ground floor and creation of new egress door on West elevation.	Approved 19.10.2021	The Honourable Society of The Middle Temple
21/00632/LBC Farringdon Without	Middle Temple Hall Middle Temple Lane London EC4Y 9AT	Formation of new fire escape stair to Middle Temple Hall, including formation of fire lobby at lower ground floor and creation of new egress door on West elevation.	Approved 19.10.2021	The Honourable Society of The Middle Temple

21/00668/XRAIL Farringdon Without	Farringdon East Ticket Hall Smithfield London EC1	Details of removal of a glazed panel and the installation of a new security door in the existing curtain walling on the Hayne Street facade of the Farringdon Eastern Ticket Hall pursuant to Schedule 7 Paragraph 11 (2) of the Crossrail Act 2008	Approved 21.10.2021	Crossrail Ltd
21/00674/NMA Farringdon Without	Tunnel Lids West Smithfield London EC1A 9NB	Non-Material Amendment under Section 96A of the Town and Country Planning Act 1990 to planning permission 19/01215/FULL dated 26th February 2021 to enable the demolition and re-building of an area of ground floor secondary structure.	Approved 26.10.2021	Gerald Eve LLP
21/00681/LBC Farringdon Without	1 Pair South 4 Paper Buildings King's Bench Walk London EC4Y 7EX	Alterations to chambers including reinstating previously removed sections of walls, installation of replica historic pattern and architectural features and the exposure and repair/ replacement of hidden architectural features.	Approved 12.10.2021	Chambers of Alex Verdan
21/00559/FULL Lime Street	35 Great St Helen's London EC3A 6AP	Alterations to the existing building, including: (i) installation of metal infill panels to the base of the existing bay windows at first, second and third floor levels; (ii) recladding	Approved 12.10.2021	Matt Doyle

		of the main entrance reveals; (iii) installation of lighting to the existing entrance canopy; and (iv) other associated works.		
21/00560/ADVT Lime Street	35 Great St Helen's London EC3A 6AP	Installation and display of one halo illuminated building number sign measuring 0.5m high, 0.5m wide, at a height above ground of 2.7m.	Approved 12.10.2021	Matt Doyle
21/00772/MDC Lime Street	3 St Helen's Place London EC3A 6AB	Submission of particulars and samples of material; details of windows (including dormers); external surfaces within the site boundary including hard and soft landscaping pursuant to condition 11 (a) (in part), (d) and (i) of planning permission dated 8th October 2019 (18/01336/FULMAJ).	Approved 26.10.2021	The Leathersellers Company

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Committee(s)	Dated:
Planning and Transportation	16th November 2021
Subject: Valid planning applications received by Department of the Built Environment	**Public**
Report of: Chief Planning Officer and Development Director	**For Information**

Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development applications received by the Department of the Built Environment since my report to the last meeting.

Any questions of detail arising from these reports can be sent to plans@cityoflondon.gov.uk.

Details of Valid Applications

Application Number & Ward	Address	Proposal	Date of Validation	Applicant/ Agent 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
21/00752/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
21/00837/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;	30/09/2021	UK Properties Specialist Ltd

		and other associated works.		
21/00798/FULL Castle Baynard	Northcliffe House, 26-30 Tudor Street, 16-22 Bouverie Street, London, EC4Y 0AY	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.	21/09/2021	DWS Grundbesitz GmbH
21/00885/FULMAJ Castle Baynard	Thavies Inn House, 3 - 4 Holborn Circus, London, EC1N 2HA	Demolition of the existing building at 1-6 Holborn Circus (known as Thavies Inn House) and the erection of a ten storey Class E building for office use with Class E retail use at part ground floor level with works to include reinstatement and new pedestrian routes through the site; hard and soft landscaping works including removal and replacement trees within the public highway, and creation of pocket park in Thavies Inn; and other works incidental to the proposed development.	22/10/2021	TIH Limited

21/00797/FULL Cheap	Livery Hall, Wax Chandlers Hall, Gresham Street, London, EC2V 7AD	Installation of plant equipment and associated louvres at roof level.	07/10/2021	The Worshipful Company of Wax Chandlers
21/00807/FULL Coleman Street	Tenter House, 45 Moorfields, London, EC2Y 9AE	Replacement of existing railings and plinth surrounding the car park ramp, replacement surface treatment to the car park ramp and bell mouth, and replacement surface treatment to the pedestrian accesses to City Point Plaza, including revisions to levels and gradients, a new pedestrian ramp, new public seating and planting and associated works to public highway.	23/09/2021	Metropolitan Properties (City) Limited
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

21/00800/FULL Farringdon Without	General Market And Annexe, West Smithfield, London, EC1A 9PS	(i) Works to the General Market roof to include partial removal, repair and refurbishment of the perimeter roof, installation of new rooflights, service dormers, a lift overrun, louvres and access steps and the formation of new areas of flat roof and glazed roof; (ii) works to the pavement lights including replacement and extension; (iii) works to the Snow Hill ramp to include new services openings, insertion of louvres and alteration of levels; (iv) insertion of a new escape door in the Snow Hill elevation of the Fish Market.	04/10/2021	Museum of London
21/00854/FULL Langbourn	150 - 152 Fenchurch Street, London, EC3M 6BB	Use of basement and ground-floor for uses within Class E; retention of retail unit at ground floor; change of use of upper floors to apart-hotel (Class C1) with 18no rooms; extension at rear of ground floor; creation of a mansard style roof extension at fifth floor; creation of a fifth floor roof terrace to the rear and plant enclosure to front; works of repair to front elevation glazed screen to 152, and other associated works.	11/10/2021	Thackeray Estates Fenchurch Limited

21/00863/FULL Langbourn	150 - 152 Fenchurch Street, London, EC3M 6BB	Replacement of the existing shopfront, including an increase to the size of the existing glazed opening, new fascia, installation of new bifold doors and works associated with the installation of new signage to retail unit.	19/10/2021	Conilon Ltd
21/00870/FULL Lime Street	147 Leadenhall Street, London, EC3V 4QT	External and internal refurbishment to include works to Grace Hall, remodelling the internal entrance lobby, remodelling the lower ground floor to include provision of cycle storage and cycle facilities (showers/lockers) , renovation of office floors 1-4, creation of new access to an existing terrace at 4th floor level, demolition of existing plant enclosure and installation of new plant within a plant enclosure at roof level. Conversion of mezzanine dining area to ancillary office use involving a change of use from events venue use (sui generis) to ancillary office use (Class E). External facade cleaning and redecoration of all internal spaces.	08/10/2021	John Robertson Architects Ltd

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 Class E) at basement, ground and first floor levels; 41no. residential units (Class C3); office terrace at first floor level; residential balconies, landscaping and cycle parking, and associated works.	27/09/2021	H Company 3 Limited
21/00795/FULMAJ Tower	S G House, 41 Tower Hill, London, EC3N 4SG	Application under Section 73 of the Town and Country Planning Act 1990 to vary condition 30 of planning permission dated 9th June 2020 (19/01051/FULMAJ) to allow for changes to the atria (mix of infill and enlargement).	20/09/2021	CMSREUK Tower Hill Propco Limited
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

21/00876/FULL Tower	Lloyds Chambers, 1 Portsoken Street, London, E1 8BT	Change of use of part of the ground floor from office (Class E) to flexible use for either higher education (Class F1) or office use (Class E); and change of use of first, second and third floors from office (Class E) to flexible use for either higher education (Class F1) or office use (Class E).	12/10/2021	AE Portsoken Property Holdings S.A.R.L
21/00873/FULL Vintry	95 Queen Victoria Street, London, EC4V 4HN	External alterations to the existing office building to include: alterations to the reception fronting Queen Victoria Street; replacement of decorative spandrel panel fronting Queen Victoria Street at ground level; replacement of glazed facade at fourth floor facing Queen Victoria Street; introduction of dedicated cycle access door fronting Lambeth Hill; alterations to form inset corner balconies at north east of building at first to third floor; alterations to plant enclosure layout at roof level; and, alterations to create a roof terrace.	11/10/2021	Quintes Services S.a.r.L
21/00610/FULL Vintry	Victoria House, 1 - 3 College Hill, London, EC4R 2RA	Alterations to replace one window at the back courtyard with louvers and replace two grills on a window on College Hill. Installation of a external an air conditioning unit within the internal courtyard.	27/10/2021	German Dental Clinic & Premier Laser Clinic UK

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