



Planning Applications Sub-Committee

Date: TUESDAY, 21 FEBRUARY 2023

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

Members:

Deputy Shравan Joshi (Chairman)	Alderman Ian David Luder
Deputy Alastair Moss (Deputy Chairman)	Antony Manchester
Deputy Randall Anderson	Alderman Bronek Masojada
Brendan Barns	Andrew Mayer
Emily Benn	Deputy Brian Mooney
Ian Bishop-Laggett	Deborah Oliver
Deputy Keith Bottomley	Deputy Graham Packham
Deputy Michael Cassidy	Alderman Susan Pearson
John Edwards	Judith Pleasance
Anthony David Fitzpatrick	Deputy Henry Pollard
Deputy John Fletcher	Ian Seaton
Deputy Marianne Fredericks	Deputy James Thomson
Jaspreet Hodgson	Luis Felipe Tilleria
Amy Horscroft	Shailendra Kumar Kantilal Umradia
Alderman and Sheriff Alastair King DL	William Upton KC
Deputy Natasha Maria Cabrera Lloyd-Owen	Alderman Sir David Wootton
Deputy Edward Lord	

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Ian Thomas
Town Clerk and Chief Executive

AGENDA

NB: Certain matters for information have been marked * and will be taken without discussion, unless the Committee Clerk has been informed that a Member has questions or comments prior to the start of the meeting. These information items have been collated in a supplementary agenda pack and circulated separately.

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 31 January 2023.

For Decision
(Pages 5 - 14)

4. **FRIARY COURT, 65 CRUTCHED FRIARS**

Report of the Planning and Development Director.

For Decision
(Pages 15 - 242)

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

Report of the Planning and Development Director.

For Information

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

Report of the Planning and Development Director.

For Information

7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

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

PLANNING APPLICATIONS SUB-COMMITTEE
Tuesday, 31 January 2023

Minutes of the meeting of the Planning Applications Sub-Committee held at Old Library on Tuesday, 31 January 2023 at 10.30 am

Present

Members:

Deputy Shravan Joshi (Chairman)
 Deputy Alastair Moss (Deputy Chairman)
 Deputy Randall Anderson
 Emily Benn
 Deputy Michael Cassidy
 John Edwards
 Anthony David Fitzpatrick
 Deputy Edward Lord
 Alderman Ian David Luder
 Antony Manchester
 Alderman Bronek Masojada
 Deborah Oliver
 Deputy Graham Packham
 Deputy Henry Pollard
 Luis Felipe Tilleria
 Shailendra Kumar Kantilal Umradia

Officers:

Zoe Lewis	-	Town Clerk's Department
Gemma Stokley	-	Town Clerk's Department
Deborah Cluett	-	Comptroller and City Solicitor's Department
Tim Fletcher	-	Media Officer
Gwyn Richards	-	Planning and Development Director
Phillip Carroll	-	Environment Department
Catherine Evans	-	Environment Department
David Horkan	-	Environment Department
Iain Steele	-	Environment Department
Peter Wilson	-	Environment Department
Kerstin Kane	-	Environment Department

1. APOLOGIES

Apologies for absence were received from Brendan Barns, Deputy Keith Bottomley, Deputy John Fletcher, Deputy Marianne Fredericks, Martha Grekos, Jaspreet Hodgson, Alderman and Sheriff Alastair King, Deputy Natasha Lloyd-Owen, Alderwoman Susan Pearson, Judith Pleasance, Ian Seaton, Deputy James Thomson, William Upton KC 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**

The Committee considered the public minutes of the Planning Applications Sub-Committee meeting held on 13 December 2022 and approved them as a correct record.

4. **FLEET HOUSE, 8-12 NEW BRIDGE STREET**

The Sub-Committee considered a report of the Planning and Development Director concerning 8 - 12 New Bridge Street London EC4V 6AL – specifically partial demolition of Fleet House and full demolition of St Bride's Tavern Public house (retention of basement levels) and the erection of a part replacement building with roof extension to provide an 8 storey building for office use (Class E) at levels 1-8, with office lobby (Class E) and commercial space (Class E) at ground floor and mezzanine level, and public house (sui generis) at ground floor level and part basement level; new pedestrian and servicing route from St Brides Lane to Bridewell Place.

The Town Clerk referred to those papers set out within the main agenda pack as well as the Officer presentation slides and an addendum that had been separately circulated and published. Officers advised that the addendum included two additional representations, a stopping up plan, amendments to the report and conditions and a corrected factsheet.

Officers presented the application, highlighting that the application site was bounded by New Bridge Street to the east, Bride Lane to the north and Bridewell Place to the south. It was reported that the site was within the Fleet Street Conservation Area, adjacent to the Whitefriars Conservation Area and that the Fleet House was built in the late 1950s.

Officers shared visuals of the planning permission that was granted for the redevelopment of the site in 2015 and had been implemented. This planning permission was for the total demolition of the building and the redevelopment of the site. This building would accommodate two flexible retail units; one that could be used as a public house and office space.

In relation to the scheme before members, images of the retention strategy were shown to the Sub-Committee. These showed the large part of the existing structure, which was to be retained, the area to be demolished and the proposed new structure. The eastern half of the existing structure would be maintained, along with the basement. The western half, including St Bride's Tavern, would be demolished along with the top floor of the building. The additional structure included two new floors.

Members were shown a visual of the proposed massing. One additional storey would be added to the top of the building, resulting in the height of the building increasing by 3.2 metres. The envelope of the building would fill out towards the

centre, increasing the amount of floorspace on the site. The image showed the stepping back at the top of the building which provided roof terraces for the office tenants and the location of these roof terraces was outlined.

The Sub-Committee were shown an existing ground floor plan. Along New Bridge Street there is retail space at ground floor level. There is a betting shop on the corner of Bridewell Place and New Bridge Street, a restaurant in the middle of the New Bridge Street frontage and an office entrance on the corner. St Bride's Tavern sits on the southwest corner on Bridewell Place next to the vehicular access point to the courtyard. The elevation on Bride Lane is very inactive and the façade is defensive offering little intervention with the public realm. The ground floor slab is raised above street level and there is stepped access into the public house, retail units and office, with no level access.

Members were shown the proposed ground floor plan. The proposed public house would have prominent frontages facing Bridewell Place and New Bridge Street. The public house would also have space in the basement. The office entrance would be positioned in a visually prominent location at the centre of the building on New Bridge Street. Steps and a ramp would make the lobby accessible. A retail unit was proposed in the north-east corner in a prominent location on New Bridge Street and Bride Lane which would create an active frontage.

It was reported that a new route was proposed which would be known as Bridewell Passage and this would link Bride Lane and Bridewell Place. It would be both a servicing route and a pedestrian route. The entrance to cycle parking in the basement would be from the Bride Lane end of the passageway.

Officers reported that vehicular servicing would predominantly take place from Bridewell Passage. Vehicles larger than 7.5 tonnes would continue to service the site from the loading bays on New Bridge Street. An offsite consolidation site would be used and there would be a maximum of 12 deliveries per day. The existing site when fully occupied had 24 deliveries per day.

Members were shown images of the existing mezzanine level and the proposed mezzanine level. The proposed retail unit would be at two levels.

Officers reported that terraces were proposed for office tenants on level 4 on the southwest corner of the building with climbing planters for vertical greening. Terraces were proposed on levels 7 and 8 which would wrap around the building and a roof terrace was proposed on the roof which would have substantial landscaping with trees and low-level planting.

Members were shown a number of images of existing and proposed elevations. Officers reported that the proposed elevations to Bridewell Passage included proposed art boards, the contents of which would be designed in collaboration with the St Bride's Foundation through the cultural plan. This would be secured through the Section 106 agreement.

It was reported that the building would be finished in pigmented, masonry panels with light coloured concrete lintels and columns, glazed bricks and anodised bronze metal work for the fenestration. The colour of the pigmented masonry panels would turn to a red tone towards the west of the building.

Members were shown the existing view from Ludgate Circus and the proposed view. The building line stepped out in this view. In the consented and implemented scheme the façade line protruded further into the street. The scheme had a curved façade which would have appeared more prominent as a result of its form in views up and down New Bridge Street. The proposed scheme would stay within that façade line and would sit more comfortably on the street.

Members were shown the existing and proposed views from New Bridge Street and Blackfriars Station and were advised that in the view of officers, the proposal would cause no harm to the character or appearance of the conservation areas, existing buildings or views. Members were also shown computer generated images of the proposal.

Officers reported that the public house was designed so that it would be integrated into the office building but would also be a distinct public house. The design made reference to existing public houses in the wider area. It would have attractive brickwork, details, planters and signage which would capture the essence of the public house façade design. The new public house would wrap around the corner of Bridewell Place and Bridewell Passage. Overall, the proposed public house would be 23 square metres larger than the existing public house in terms of gross internal area and 132 square metres larger in terms of net internal area. The ground floor frontage would be approximately 24 metres longer and would face two streets instead of one.

Officers concluded that the proposed building would result in the aesthetic enhancement of the dated 1950s building, the addition of one additional storey and the increased massing would all sit well in its context and a significant proportion of the existing structure would be retained. The proposals would add approximately 1,800 square metres of floor space and double the occupancy of the building. They would provide enhanced public realm at ground floor, offer vibrant active frontages and would provide a new pedestrian route. The public house was considered to be high quality with a distinct character and appearance and would make a positive contribution to the surrounding area. The application would secure development that was environmentally responsible. The application for planning permission was therefore recommended for approval.

The Chairman explained that there were no registered objectors to address the meeting on this occasion and he therefore invited the applicant to speak.

Eoin Conroy, speaking on behalf of Atenor UK, the owner of the applicant advised that Atenor is a pan-European developer and investor in real estate. Atenor's business model is investment in sustainable development both social and environmental. Fleet House was Atenor's first investment in the City of

London. It was acquired on a leasehold basis in February 2022. Fleet House came with existing planning consent but following acquisition, it was decided that there was an opportunity to improve the scheme by applying the sustainable principles and modern workplace principles to reflect the new lifestyles and workplace environments. The revised proposal adopted Atenor's in-house principles of sustainable development and tried to apply that to the design development of the project. Members were shown images of the consented and proposed schemes.

David Weatherhead, Design Director for the applicant's architect explained that the proposed building would be sensitive in its location and acknowledge the conservation area and looked to enhance the area in a positive way. The site had a heritage in publishing from the 16th century to the 20th century. It was important to provide long term benefits. A sustainable strategy had been embedded into the proposals. Embodied carbon was an important consideration as was attracting people back to the City post pandemic. The passageway would create improved connectivity. Some people's values had changed since the pandemic and it was important to provide a building which was sustainable and encouraged natural daylight, views and positive distraction.

An optimisation strategy had been produced to ascertain the greatest amount of carbon that could be kept in the building while also having safe on-site servicing and a modern building with efficient cores and a safe design. Adding a new area would make the building more adaptable for the next 75 years. 80% of the usable office structure and 73% of the existing building were being retained and 3,428 square metres of new structure would be added. A storey would be added to the building but this would be set back and the main frame of the building would be retained.

Members were advised that the ground floor would have new and vibrant uses and provide a building which was safe, sustainable and active. The existing ground floor has a public house, betting shop and a food and beverage outlet. It has a total of nine entrances all of which are stepped. The proposed scheme would provide level access to every use in the building, the servicing and stairways. The service yard of the existing building can not be used for many large vehicles. A service layby on Bridewell Place was used until it was removed in 2015 to provide a two-way street.

The provision of a new pedestrian passageway would link Bridewell Place to Bride Lane, would provide on-site servicing and also help to increase footfall to other attributes around the city including Bridewell Theatre and St Bride's Church. This would increase the network of passageways in the conservation area enforcing character and would also be the safest approach for the site.

The proposed building would be unique in terms of a ground floor that could be accessed on all sides and provide an active frontage on every corner. It would be an inviting building and it had been possible to retain the southern staircase in order to further enhance the embodied carbon of the building.

Ian Anderson from Litchfield's Planning and Development Consultancy, stated that the new scheme would provide tangible benefits and the new passageway would provide improved connectivity, safe off-street servicing and would enhance the quality of the conservation area. He stated that the development reflected green credentials with a prominent cycle parking entrance on Bride Lane as well as showers and changing rooms. The scheme would contribute to a vibrant economy delivering enhanced employment space supporting the aspirations of the Fleet Street Business Improvement District through the activation of ground floor space and enhanced inclusive and accessible public house.

The sustainable strategy retained 72% of the structure which meant there would be a shorter build time and disruption to neighbours.

The public house had been subject to significant discussions with Officers in terms of its design. The proposed public house would provide a modern interpretation and be inclusive and accessible providing double height space in a welcoming environment. The use of bricks and glazing was modern, however, the design acknowledged the location in the Conservation Area and other public houses in the locality. The pub windows were canted adding to the character of the pub. Flowerbox planters, solid banding, signage and hanging baskets would add to the character. Sash windows would lower to give an outside feel when the weather permitted.

Mr Anderson stated that the development had the full support of the Fleet Street BID who had noted that the predevelopment of Fleet House demonstrated a practical and necessary proposal that could invigorate and stimulate the local area with the potential to reinvigorate streetscapes, public spaces and economic prospects that were welcome and celebrated. It was hoped that the City of London Corporation would approve the application and continue to support the ongoing regeneration enhancements of the wider Fleet Street quarter area. The introduction of a new highly sustainable office building would drive the economic viability of the city as well as deliver tangible benefits to the local area through the provision of public realm, accessibility improvements, new public art, a cultural strategy and extensive greening and planting aligning with the ambitions of the BID.

The Chairman thanked the applicant team for their contributions and invited questions of them from the Sub-Committee.

A Member asked how long the public house would be closed during the demolition and construction works and was advised that there would be an approximate two-year construction period during which the pub would be closed. It was anticipated that construction would begin in 2023. The Member asked if the intention was for the public house to be reopened for the Christmas 2025 trade and was advised this was the developer's aspiration although there were many factors outside of the developer's control. The aim was to start and finish the construction as soon as possible.

A Member asked for more information about the mezzanine floor, where it would be located and how it would be used. Officers advised that the ground floor height was 5.8m high and the site further dipped down on Bridewell Place another 850mm. Therefore it was possible to put in a mezzanine floor along part of Bridewell Place and include a mezzanine height above the retail space to fit within the ground floor at double height volume.

A Member commented that servicing using Bride Lane could be problematic as there were residents living there. He stated that there were no residents living in Bridewell Place. He was advised that although vehicles would access the passage via Bride Lane, no servicing would take place on Bride Lane so there should not be any nuisance to residents.

A Member asked for clarification on the vehicular access proposed on Bridewell Passage. He was advised that there was an overnight servicing strategy to avoid vehicles using the passage during the day so pedestrians could freely use the passageway during the day. The passageway would be closed to vehicles during the day through the use of bollards. To promote the safety of pedestrians, there would be gates in the passage which would be closed during servicing. They would remain open at all other times.

A Member asked for details of the measures that would be taken to discourage anti-social behaviour. The applicants advised that there would be a robust passive surveillance and active surveillance strategy including a lighting strategy which would discourage anti-social behaviour. There would also be an active frontage with visibility of the lane at all times.

Members asked questions about the name of the new public house. The applicants stated that they were amenable to working with a third-party operator to discuss naming options but the applicant was unable to impose a name on a third-party operator. The applicants were willing to work on a good faith basis to have a public consultation about name options. Officers stated it was not considered reasonable or appropriate to impose a name but the matter could be included in the cultural management plan and be part of the legal agreement.

Seeing no further questions of the applicant, the Chair sought out any remaining questions of Officers.

A Member raised concern that if the application was approved, construction was likely to take place at the same time as the Salisbury Square development construction. He stated that there was already significant disruption in the Whitefriars area with heavy goods vehicles being parked on Tudor Street. He asked that officers work to ensure that construction of the two developments in parallel did not disrupt businesses and residents in the immediate vicinity. Officers stated that a construction and traffic management plan would be required for this development. The Salisbury Square development and other sites in the area also had construction traffic management plans.

A Member asked about the cultural plan, the link with St Bride's Foundation, how this would link with any art and naming and whether there was a connection with policy in recognising the pub as a heritage asset. Officers advised that there had been initial discussions about the use of advertising boards for the Bridewell Theatre and details would be agreed at a later date. The public house had been assessed as a non-designated heritage asset but fell short of the requirements to be listed as such.

The Sub-Committee then moved to debate the application.

A Member stated that the proposal was a positive reuse of the vast majority of the building, was an improvement on the consented scheme and would sit comfortably on New Bridge Street. The scheme would replace the 1950s block and the additional permeability with the new passageway was welcomed. Along with other passageways and footways being constructed through the Salisbury Square development to St Bride's Church, this would enhance the area and accessibility of the church. The importance of having a public house in this location was acknowledged. Although the existing pub was the Bride's Tavern, previous names were The White Friar and White Bear. If the public house was given one of these names it would be welcomed but it was not for the Sub-Committee to dictate the name. It was vital that the construction process was tied in with the development on Salisbury Square to minimise disruption.

A Member stated that this proposal was a major upgrade on the consented scheme and the submission from the BID was welcomed.

A member commented on the accessibility of the site and underlined the transport links including Blackfriars Station, nearby Crossrail Station which would have 140 trains an hour passing through, bus routes passing the site as well as a busy cycle lane. He welcomed the scheme which was more relevant to today's potential occupants than the previous consented scheme. The continued trend of close co-operation between architects, designers and planning officers was welcomed. The design of the scheme was sensitive to the location and its likely future use as part of the legal district Fleet Street had become with the new courts nearby.

A Member commended the work that had taken place in relation to sustainability since the previous scheme was approved in 2015.

The Chairman summed up the points made and stated that the sustainability improvements included the retention of embodied carbon, over 70% of the existing building being retained, the use of air source heat pumps and photovoltaic cells. This was a good exemplar of sustainability in the city. The inclusion of a public house double the size of the existing one was welcomed and it was hoped this would attract more business. The ground floor activation was important as was looking at the overall project.

Having fully debated the application, the Committee proceeded to vote on the recommendations before them.

Votes were cast as follows: IN FAVOUR – 16 votes
OPPOSED – None
There were no abstentions.

The recommendations were therefore carried unanimously.

RESOLVED -

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 and Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed;

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

(3) That it be agreed in principle that the land affected by the building which is currently public highway and land over which the public have right of access may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers be instructed to proceed with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order for the area shown marked on the Stopping-up Plan annexed to this report under the delegation arrangements approved by the Court of Common Council.

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

The Sub-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 the report be noted.

6. ***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 applications received by the Department of the Built Environment since the report to the last meeting.

RESOLVED – That the report be noted.

7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

Committee Visit to Wren Church with newly installed Air Source Heat Pumps

A Member commented that the Sub-Committee had recently been offered the opportunity to visit a church where air source heat pumps had been installed to

replace the heating system for economical reasons rather than for environmental reasons. The building had single glazing which could not be changed as they were stained glass windows and the walls could not be insulated. Only the roof could be insulated. The building had to be heated all the time as it was used seven days a week. The prices of electricity and gas had been considered before installing an air source heat pump system. He asked how this could be encouraged across the City of London.

An Officer advised that this could be included in the Climate Action work stream as a positive example along with another church where photovoltaic panels and a green roof had been installed on the roof. The city had many sensitive assets for which it was more difficult to include measures that could be used in an office building.

Thavies Inn

A Member asked a question about the inclusion in the delegated decisions report of the demolition of Thavies Inn House as this had been approved by the Sub-Committee. Officers advised that it was presumed that it had been issued as the Section 106 had been signed. The Member asked that in the future where this was the case, it was explained in the report.

8. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT **Awayday**

The Chairman thanked officers for their work and requested that Members and Officers complete the feedback questionnaire that had been sent to them.

The meeting ended at 11.25 am

Chairman

Contact Officer: Zoe Lewis
zoe.lewis@cityoflondon.gov.uk

Agenda Item 4

Committee:	Date:
Planning Application Sub-Committee	21 February 2023
Subject: Friary Court 65 Crutched Friars London EC3N 2AE Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (770 rooms) and associated amenity space (Sui Generis); Museum use at part ground, first and second floor levels (Use Class F1(c))(+3101sq.m GIA); hard and soft landscaping; ancillary plant and servicing; and associated works.	Public
Ward: Tower	For Decision
Registered No: 22/00882/FULMAJ	Registered on: 30 September 2022
Conservation Area: No	Listed Building: No

Summary

The application proposes the demolition of an office building and erection of a new 74.9m(AOD) high building comprising student accommodation and associated amenity space (Sui Generis), Museum use at part ground, part first and part second floor levels (Use Class F1(c)), and public realm improvements including a new public courtyard.

The student accommodation would provide 770 student rooms, of which 35% will be affordable. The rooms represent a range of typologies, including studios and shared accommodation. 5% of the bedrooms are proposed to be wheelchair accessible, with a further 5% designed to be wheelchair adaptable.

In addition to the student accommodation, the Proposed Development makes provision for 3,101 sqm (GIA) cultural and community use to be curated and operated by the Migration Museum and set over three floors.

The original submission has been revised following Officer comments including amendments to building massing, design and materiality. Amendments to the scheme have also been provided which incorporate the Migration Museums

specific requirements for this space and include exhibition space, event space, cafe /museum shop, associated offices, co-working and educational spaces.

The Applicant has provided justification for the loss of office at the site which has been independently reviewed. It is considered that the loss of office floorspace would be acceptable in this instance. The proposed uses of student accommodation and museum would not compromise the primary business function of the City.

The development is considered to be fit for purpose and provide for student well-being and activities, ensuring a range of high-quality and accessible, internal and external, communal amenity space. The provision of purpose-built student accommodation in this mixed-use development would not prejudice the business function of the City, would not result in an excessive concentration of student housing and is not considered to have an adverse impact on residential amenity of surrounding properties. Whilst officers are concerned about the low level of light to some of the rooms and kitchen areas, on balance, officers are of the view that students would have the option of using amenity, breakout and study areas located throughout the building, along with the use of the publicly accessible roof terrace. The proposals also include 35% affordable student bedspaces and provides for 10% accessible rooms. On balance, the purpose-built student accommodation would accord with London Plan and Local Plan Policies and is considered acceptable.

The proposed museum is considered to be an enhancement to the City's cultural provision and provide significant public benefit to residents, workers, and visitors. Having an identified operator who have been able to specify requirements at an early stage in the design process and a strong commitment from the developer to provide this space at rent and service charge free for 60years will ensure that this cultural space is deliverable.

The Local Plan and London Plan supports the delivery of cultural uses. The proposed museum would provide a destination cultural and community space which would contribute towards the Corporations Destination City initiative of creating fun, inclusive and innovative spaces and places that attract people to the City.

The development makes the optimal use of site capacity relative to constraints and delivers a scheme which supports 'Good Growth' by-design objectives, that is growth, which is socially, economically and environmentally inclusive.

The architectural form of the proposal would be commensurate in height, scale and massing with other buildings towards the 'foothills' of the City Cluster. The development would also successfully mediate the changes in scale in the local

context. The cascading massing, highly articulated design, materials, colouration and intended quality is fit for purpose and would add a level of richness and visual interest to the local townscape and skyline and would support the emerging vibrancy of the wider area. The quality of the proposed elevations, active edges mix of land uses, in particular the Migration Museum, public spaces, cycling provision and servicing operations would enhance existing site conditions.

The proposed Migration Museum, student accommodation and public realm proposals would enrich the existing learning and educational offer to deliver a vibrant wider neighbourhood, both during the day and at night, in accordance City's broader visions to deliver outstanding places, as part of 'Destination City', 'City Recharged' (2020), 'Future City' (2021) and 'Culture and Commerce' (2021). The proposals would also key into the Aldgate Connect BID (established 2020) and the Aldgate Connect Public Realm Vision and Strategy 2022.

The proposed design and layout of the Museum promotes an active and open facade, with prominent and distinctive entrances which make a positive contribution to the surrounding streets. The student accommodation is legible, well designed and fit for purpose. 244m² of new public realm is proposed as part of the development comprising a new courtyard area along Northumberland Avenue and additional pavement around the building as well as planting and seating integrated within the building facade adjacent to the public highway. The proposal additionally enables the delivery of a new pocket park on Rangoon Street through Section 278 works

An appropriate lighting scheme would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City by night.

The tiered stepped form would preserve strategic skyline views from the South Bank Queen's Walk and Tower Bridge in relation to the Tower of London and also responds to the former Port of London Authority building (grade II* and City Landmark) and proximity to the Lloyds Avenue Conservation Area.

The development would preserve the ability to recognise and appreciate the OUV of the Tower of London as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF and other guidance. The proposed building would therefore comply with London Plan Policies, HC2 and HC3, HC4 which seeks to ensure the implementation of the LVMF.

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.

The proposal, by way of impact on setting, would preserve the heritage significance of Lloyds Avenue Conservation Area and numerous heritage assets, and an appreciation of that significance.

There are no identified local non designated heritage assets which would be affected by the development. Friary Court has limited architectural and historic values and it is considered it does not meet the criteria to warrant non-designated heritage asset status.

Potential archaeological impacts would be mitigated by an appropriate phased condition. conditions. The S106 will also require collaboration with the Historic Environment Record Greater London to secure opportunities for inclusion of archaeology and public engagement on the site as a part of the cultural programme for the Museum and heritage interpretation across the site.

The proposed development is on track to achieve an "outstanding" BREEAM assessment rating. The upfront embodied carbon emissions can be reduced beyond the GLA's Standard Benchmark. Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible, residential 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 the new Part L 2021 and London Plan requirements.

The Health and Safety Executive (HSE), who are the statutory respondent in relation to fire safety on development of this nature, have been consulted on this application and are satisfied with the information provided within the application, including the submitted Fire Statement.

A daylight, sunlight and overshadowing assessment and supplementary radiance assessment have been undertaken to assess the impact on the daylight and sunlight received by neighbouring properties and the direct sunlight received by surrounding external amenity areas, and an internal daylight and sunlight assessment has been undertaken to assess the impact on the rooms within the development.

Whilst there would be some impact on the daylight and sunlight received by the neighbouring Roman Wall House student accommodation, the impacts attributed to the proposed development itself would generally be in accordance

with the BRE guidelines, with the majority of transgressions stemming from the Boundary House redevelopment, which is to be expected and is acceptable given the densely developed urban nature of the site and surroundings. There would be some moderate and major impacts to the hotel rooms in the resolution to grant Boundary House scheme, which is directly adjacent to the application site. The transient nature of hotels means they are less sensitive in this regard. The surrounding external amenity areas assessed would experience fully BRE compliant alterations in the direct sunlight that they receive.

Wind conditions and Thermal Comfort conditions will be maintained at levels suitable for intended uses at street level and at roof terrace levels for both the proposed development and for roof terraces at 80 Fenchurch street and proposed terrace at Boundary House.

The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan (i.e., the London Plan and Local Plan) and relevant policies and guidance, SPDs and SPGs, relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.

It is almost always the case that where major development proposals come forward there is at least some degree of non-compliance with planning policies, and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

In this case, the proposals are considered to be in accordance with the development plan as a whole. In addition, the Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

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

Recommendation

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


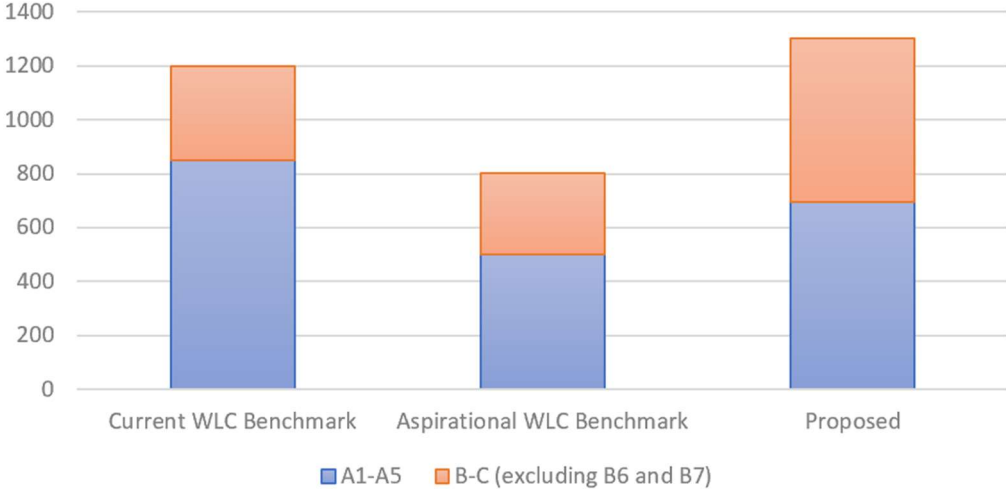
(a) planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed;

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

APPLICATION COVER SHEET

65 Crutched Friars

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	Top of Roof – 36.20 m		Top of Roof (including parapet) – 74.9 m	
	Parapet height – 34.15 m		Level 20 – 71.35 m	
2. FLOORSPACE GIA (SQM)	USES		EXISTING	
	Office Use (Use Class E(g)(i))		6,949 sqm	Migration Museum (Use Class F1)
	Bar (Sui Generis)		364 sqm	Student Use (Sui Generis)
	TOTAL		7,313 sqm	TOTAL
3. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	Maximum Occupancy – 400 employees		Migration Museum – 23 employees	
	Current Occupancy – 250 employees		Student Use – 10 employees	
	<i>(Building due to fall vacant May 2023)</i>			
4. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	0	Car parking spaces	1 (blue badge)
	Cycle long stay	0	Cycle long stay	587 (policy compliant)
	Cycle short stay	14	Cycle short stay	54 (policy compliant)
5. HIGHWAY LOSS / GAIN	No Impact to Highway			
6. PUBLIC REALM GAIN	244 sqm increase			
7. STREET TREES	EXISTING		PROPOSED	
	<ul style="list-style-type: none"> 13 existing trees (category C and B) within the private courtyard and along Northumberland Avenue boundary all of which are to be removed. 		<ul style="list-style-type: none"> 3 trees proposed as part of the new Northumberland Alley Courtyard 3 street trees proposed along Crutched Friars Section 106 obligation to provide 8 trees off site within the local area 	

8. SERVICING VEHICLE TRIPS	<p style="text-align: center;">EXISTING</p> <ul style="list-style-type: none"> 30 trips per day 	<p style="text-align: center;">PROPOSED</p> <ul style="list-style-type: none"> Student use - 25 trips per day Migration Museum - 3 trips per day 												
9. VOLUME OF RETAINED FABRIC	<ul style="list-style-type: none"> 20 % (by mass) of the existing substructure is retained 													
10. OPERATIONAL CARBON EMISSION SAVINGS	<ul style="list-style-type: none">  70 % <p>Improvement against Part L 2021 using SAP 10.2 carbon factors (Policy Target 35%)</p>													
11. Operational Carbon Emissions	<p style="text-align: center;"> 573,249.80 kgCO₂e/annum 20.59 kgCO₂e/m²/annum 1,235.00 kgCO₂e/m² over 60 years </p> <p>(values covers Module B6 only and includes the decarbonisation of the grid)</p>													
12. EMBODIED CARBON EMISSIONS	<p style="text-align: center;">Comparison with WLC Benchmarks by stage (in kgCO₂/m² GIA)</p>  <table border="1" style="margin-top: 10px;"> <caption>Approximate data from the chart</caption> <thead> <tr> <th>Benchmark</th> <th>A1-A5 (kgCO₂/m² GIA)</th> <th>B-C (excluding B6 and B7) (kgCO₂/m² GIA)</th> </tr> </thead> <tbody> <tr> <td>Current WLC Benchmark</td> <td>~850</td> <td>~350</td> </tr> <tr> <td>Aspirational WLC Benchmark</td> <td>~500</td> <td>~300</td> </tr> <tr> <td>Proposed</td> <td>~700</td> <td>~600</td> </tr> </tbody> </table> <p style="text-align: center;">The proposed was compared against residential benchmarks</p>		Benchmark	A1-A5 (kgCO ₂ /m ² GIA)	B-C (excluding B6 and B7) (kgCO ₂ /m ² GIA)	Current WLC Benchmark	~850	~350	Aspirational WLC Benchmark	~500	~300	Proposed	~700	~600
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Current WLC Benchmark	~850	~350												
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13. WHOLE LIFE-CYCLE CARBON EMISSIONS (kgCo₂e/m² GIA)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td style="background-color: #4CAF50; color: white;">693</td> <td style="background-color: #0070C0; color: white;">547</td> <td style="background-color: #ADD8E6;">1,235</td> <td style="background-color: #ADD8E6;">65</td> </tr> <tr> <td style="background-color: #4CAF50; color: white;">Product & construction A1-A5</td> <td style="background-color: #0070C0; color: white;">Use B1-B5</td> <td style="background-color: #ADD8E6;">Op. energy & Water use B6-B7</td> <td style="background-color: #ADD8E6;">End of Life C1-C4</td> </tr> </table> <ul style="list-style-type: none"> TOTAL: 70,723,760 kgCO₂e/60 years 				693	547	1,235	65	Product & construction A1-A5	Use B1-B5	Op. energy & Water use B6-B7	End of Life C1-C4		
693	547	1,235	65											
Product & construction A1-A5	Use B1-B5	Op. energy & Water use B6-B7	End of Life C1-C4											

14. WHOLE LIFE-CYCLE CARBON OPTIONS

Scenario 1: Deep Refurbishment and Extension
 Scenario 2: New Building and Deep Refurbishment
 Scenario 3: New Building and Deep Refurbishment
 Scenario 4: New Building



	Scenario 1	Scenario 2	Scenario 3	Scenario 4
kgCO₂eq/m²				
Whole Life Carbon	2,733	2,186	2,228	2,163
Operational Carbon	1,183	1,126	1,126	1,126
Embodied Carbon	946	1,003	1,102	1,037
Tonnes CO₂eq				
Whole Life Carbon	29,385	42,093	50,046	60,218
Operational Carbon	16,325	22,263	25,298	31,352
Embodied Carbon	13,060	19,830	24,748	28,866

15. TARGET BREEAM RATING

- **Outstanding** (policy target Excellent or Outstanding)



16. URBAN GREENING FACTOR

- **0.39** (policy target 0.4 for residential)

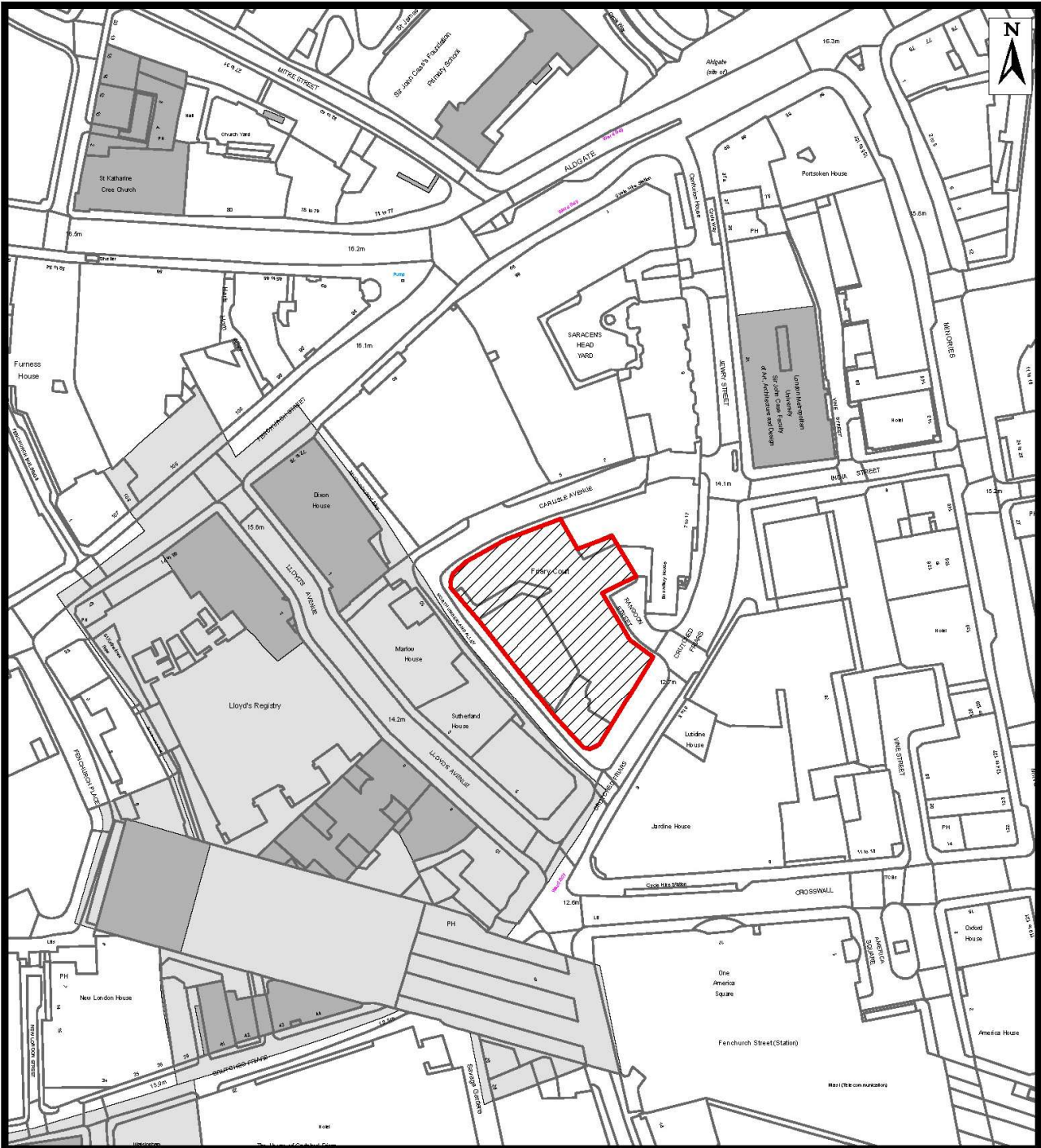
17. BIODIVERSITY NET GAIN

- **191.85%**

18. AIR QUALITY

- Air Quality Neutral (policy target AQN)


Site Location Plan



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ADDRESS:
65 Crutched Friars

CASE No.
22/00882/FULMAJ

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



ENVIRONMENT DEPARTMENT



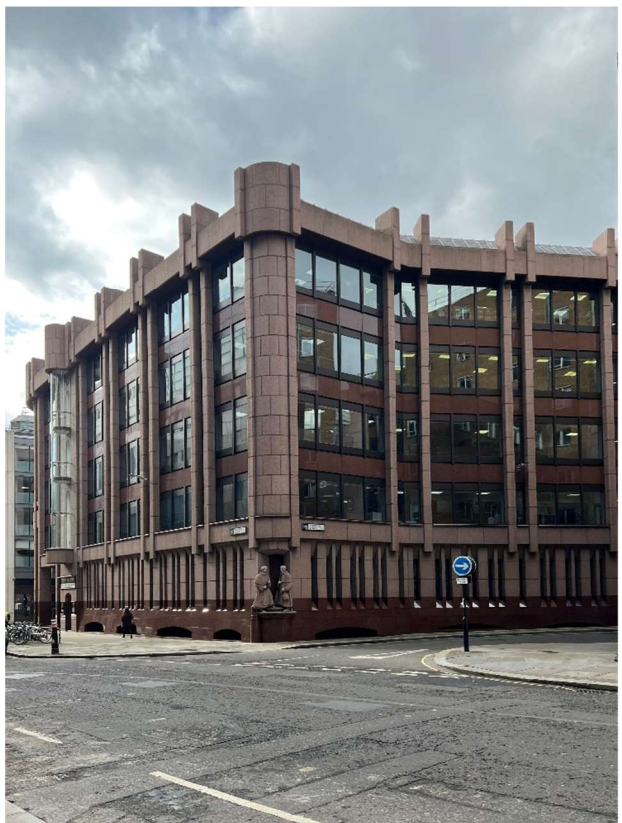
View from Crosswall and Crutched Friars Junction



View from Rangoon Street



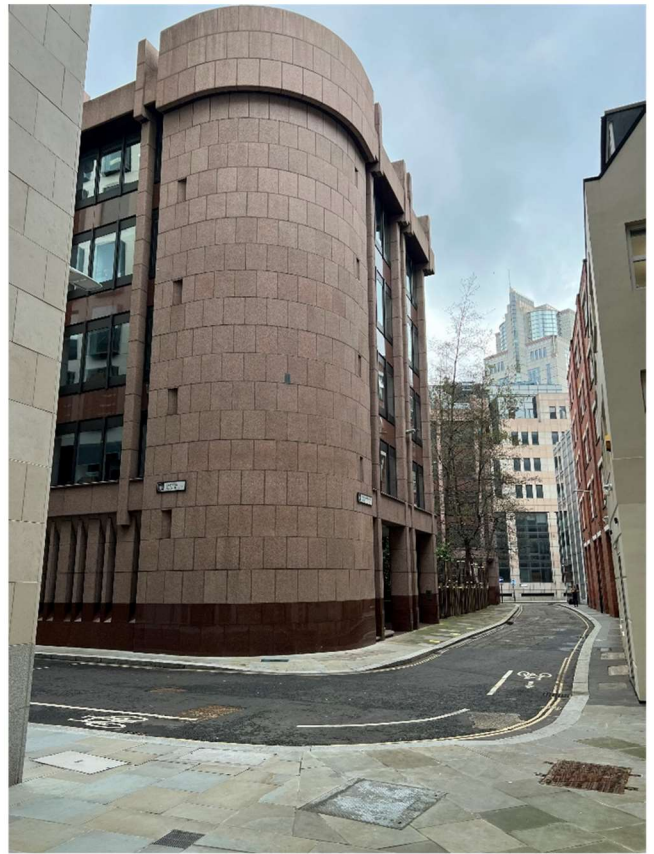
View of existing private courtyard on Northumberland Alley



View from Crutched Friars looking towards Rangoon



View from Carlisle Avenue looking west



View from Northumberland Alley looking south

Main Report

Site

1. The application site comprises a 0.2 ha Site bound by Crutched Friars to the east, Northumberland Alley to the south, Carlisle Avenue to the west and Rangoon Street, along with commercial buildings, to the north.
2. The Site currently accommodates a 5-storey office building (Use Class E(g)(i)) with basement, which was completed in 1984. The Office building is currently occupied, with the existing tenant due to vacate the building in May 2023.
3. The building also includes a former basement-level bar (Use Class sui generis) accessed from Crutched Friars which has been vacant since late 2020.
4. The Site falls within the heart of a triangular network of streets which can be broadly defined by Fenchurch Street station and its viaduct to the south, Fenchurch Street to the west and Minories to the east. The main vehicular access to the Site is currently obtained from Rangoon Street, off Crutched Friars. The main pedestrian entrance into the existing building is on the corner of Crutched Friars and Northumberland Alley
5. Emperor House (Urbanest) is located to the east of the Site, comprising student accommodation. Boundary House is located to the east of the site, which is currently an office building, but with a recent resolution to grant permission for a hotel led scheme.
6. The Site does not lie within a Conservation Area, however, Lloyds Avenue Conservation Area is located to the west of the Site. In addition to the Lloyds Avenue Conservation Area, Fenchurch Street, Trinity Square and Crescent Conservation Area are located to the west of the Site. The Site does not contain any statutory or locally listed buildings. However, 72-75 Fenchurch Street is to the south west of the Site along Northumberland Alley and is Grade II Listed.

Planning history and other relevant consents

7. An application has recently been submitted (31st August 2022) to allow for the former basement-level bar to be occupied for an art space / workspace use (sui generis). The area is proposed to be occupied by Numbi Arts for a temporary period up to 31st May 2023.
8. To the east of the Site, Boundary House is located, which currently comprises of offices and has recently secured a resolution to grant for redevelopment for a hotel-led scheme (Ref: 21/00826/FULMAJ).

Proposal

9. Planning permission is sought for the redevelopment of the site for a new 74.9m(AOD) high building comprising student accommodation and

associated amenity space (Sui Generis), Museum use at part ground, part first and part second floor levels (Use Class F1(c)), and public realm improvements including a new pocket park.

10. The proposed development would comprise:

Use	Floorspace (GIA)	Floorspace (GEA)
Student (Sui Generis)	24,528 sqm	27,687 sqm
Cultural and Community (F1/F2/ Sui Generis)	3,101 sqm	3,375 sqm
	Total Floorspace	27,629 sqm
		31,062 sqm

11. The student accommodation would comprise 770 student rooms, of which 35% will be affordable. The rooms represent a range of typologies, including studios and shared accommodation. 5% of the bedrooms are proposed to be wheelchair accessible, with a further 5% designed to be wheelchair adaptable.

12. The studio accommodation ranges from 15 sqm to 25 sqm, with accessible units ranging from 24sqm to 30sqm. Each studio would accommodate a 1.2m x 1.9m bed, an en-suite bathroom and kitchenette. The twodio, threedio and quods would either have en-suite bedrooms or bedrooms with a communal bathroom and each containing open plan communal kitchens, living and dining space.

13. Student bedrooms are to be provided from third to twelfth floors.

Room Type	Studio	Twodio	Threedio	Quods	Total
Quantum	556	20	150	44	770

14. The proposed student accommodation will also include shared internal and external amenity space. Internal community space is provided at ground, second and third floor levels. The ground floor space accommodates a reception area and a breakout / lounge area. The second floor would facilitate quieter functions, with a range of collaboration spaces, quiet study areas and workshop areas. The third-floor level would accommodate facilities such as a cinema room, gym, games area, laundry, and café, this space would be directly connected to the external amenity terrace at this level.

15. In addition to the student accommodation, the Proposed Development makes provision for 3,101 sqm (GIA) cultural and community use to be curated and operated by the Migration Museum and set over three floors. Amendments to the scheme have been provided which incorporate the Migration Museums specific requirements for this space and include exhibition space, event space, café/museum shop, associated offices, co-working and educational spaces.

16. The proposed development would also provide public realm improvements including a new publicly accessible courtyard onto Northumberland Alley with three new trees, widened pavement areas around the site, urban greening along the building perimeter on Northumberland Alley and Crutched Friars, and three new street trees along Crutched Friars. The Proposed Development would include an extensive range of soft landscaping features to enhance urban greening biodiversity, including on the roof terraces, courtyard area and window box planters.
17. A range of Section 278 works are proposed including works on Rangoon Street to deliver a new pocket park in conjunction with the adjacent scheme at Boundary House.
18. The development would provide 587 long stay and 53 short stay cycling spaces. No new vehicle parking spaces are proposed, except for one disabled parking space within the demise of the building.
19. Two ground floor servicing bays are to be provided, accessed from Carlisle Avenue to be managed through a detailed Delivery and Servicing Plan. The servicing would be subject to consolidation which would be secured via a S106 obligation.

Consultation

20. The Applicants have submitted a Statement of Community Involvement outlining their pre-application engagement with stakeholders. Prior to the application being submitted the applicant has undertaken extensive consultation with key decision-making authorities, key stakeholders and local community (including nearby residents and places of worship). A project website was established which included a virtual exhibition of the proposals for the public to view and make comments.
21. Following receipt of the application the application has been advertised and consulted on. Nearby residents were included in the consultations. Copies of relevant letters and emails received are attached in Appendix A.
22. An additional consultation took place in October 2022 to consult on amendments received in relation to occupation of the cultural and community space by the Migration Museum and the design of these spaces to best accommodate the Museums requirements and aspirations.
23. Views of other City of London Corporation departments have been considered in the preparation of this scheme and some detailed matters are addressed by the proposed conditions and the terms of the S106 agreement.
24. A summary of the consultation external responses is provided in the table below and responses are available to view on the public website and are listed in the background papers list at the end of this report.
25. A letter of objection has also been received from Ward Members.

26. The Health and Safety Executive confirmed that the development has met the requirements for consultation regarding Fire Safety and are satisfied with the proposal.

Consultee	Summary of comments
London Borough of Hackney	No Objection.
Heathrow Safeguarding	No objection.
Health and Safety Executive	The amended drawings uploaded onto the LPA planning portal dated 25/11/2022 show internal alterations have been made to the design of the ground, first and second floors that address the advice provided within the previous substantive response regarding the residential stair connecting with the cultural area. HSE remains content with the fire safety design, in relation to the relevant building, to the extent that it affects land use planning.
Historic England	Historic England do not comment and take the position that the views of specialist local conservation officers are sought.
Historic England: GLASS	<p>Recommendation that the archaeology previously found on the site be included within the Migration Museum offer, as the archaeological story from the site could likely feed into the Migration Museum themes in a positive way.</p> <p>The Archaeological Desk Based Assessment was amended November 2022 to cross reference to the cultural strategy and links between archaeology and the Migration Museum. <i>The archaeological remains from the previous archaeological investigation within the site, and potentially the results of the excavation of the remaining area, together with the archaeology and history of the broader area, all offer an opportunity to link the heritage of the site and surrounding area, to the themes of the Migration Museum, fulfilling the objectives of the Cultural Plan.</i></p> <p>A S106 Cultural Plan will require archaeology previously found on the site to be included in the Migration Museum offer.</p>
Historic Royal Palaces Tower of London	We do not object to the development proposals, there not being in, our view, any significant harm to the Outstanding Universal Value of the World Heritage Site.

	<p>We do warmly welcome the exciting proposals for the Migration Museum, which we believe would be a fantastic cultural destination in the City of London and a wonderful contribution to the Corporation's 'Destination City' vision. The story of migration is absolutely central to the rich and layered history of the British Isles and one that would sit alongside the diverse and inclusive histories that we tell at the Tower of London, alongside the more familiar histories for which we are known. We would look forward to potential opportunities to work together with the Museum.</p>
Lead Local Flood Authority	No objection subject to conditions.
London City Airport	No objection.
Thames Water	No objection subject to the inclusion of conditions and informative.
Twentieth Century Society	<p>The Society object. The Society considers Friary Court as a robust and characterful commercial building in the City of London and that it makes a strong contribution to the rich and diverse townscape of this part of the City. The Society considers that it should be identified as a Non-Designated Heritage Asset (NDHA) and that the building is of high heritage significance and that the demolition would result in substantial harm.</p> <p>The Society considers the applicant has downplayed heritage significance and the level of heritage harm that would result from its total demolition. The Society states the building could be retained in use, with some sensitive adaptations and fabric upgrades to improve its EPC rating and ensure the comfort of future occupiers. The Society states that demolition should be seen as a last resort, especially here when the building has clear and significant heritage value. The Society concludes that if as the applicant claims, the building cannot be made to fit the proposed project brief and aspirations then the brief needs to change. There should be clear public benefits afforded by the preservation and adaptation of this important heritage asset.</p> <p>This report addresses these objections within the heritage and sustainability sections.</p>

27. Nearby residents, the student residential properties and the educational uses were consulted, and 26 letters of objection, 7 letters of support and 1 letter of comment have been received from the public. The 26 letters of objection are summarised in the table below.

Issues	Number of objections relating to this issue	Paragraph of report where issues are addressed
Noise	22	467-473
Detrimental to Residential Amenity	4	92 – 97 and 467-473
Physical infrastructure insufficient	17	275-277
Crime/Antisocial Behaviour	4	92 - 97
Incompatible with area's character	19	124-141 and 170-172
Litter/cleansing issues	18	97 and 284-287
Nuisance during construction	15	281
Daylight and Sunlight	1	385-429
Height/Massing	1	126-130, 141-143, and 170
Additional pressure on public services (GPs, etc.)	5	504
Ecological impact of demolition	15	328-334 and 343-350
Incongruous with Destination City	15	235 -243
Light Pollution	1	460-466
Harm to Grade I Listed Trinity House	1	224- 227
Air Pollution	1	474-478
Loss of Office Space	1	63 - 78

28. A petition has also been received from the residents of 1 Pepys Street which gained 29 signatures. They object on the grounds of additional noise pollution, the concern that infrastructure could not cope with additional people, that the development is out of character compared with the area, and that local public services would face additional pressure. Officers consider that the petition does not raise any issues beyond those covered in the table above and issues are therefore covered in the relevant paragraphs in the following report.

29. A letter of objection has been received which has been co-signed by the following elected members: Rt. Hon. Lord Mayor, James Tumbridge CC, Jason Groves CC, and Aaron D'Souza CC. The letter details the following concerns in relation to this proposal: the proposed loss of office space within the City; increased student housing within an area that already has student housing; student participation and economic activity is not the same as residents or workers and would detract investment from hospitality or leisure; the demolition of a building, which is a landmark to locals, would go against sustainability and climate considerations and is not aligned with a Net-Zero Climate Strategy; student housing does not

contribute or fulfil the Corporations 'Destination City' vision; the developer has no history of successfully delivering student accommodation. The letter does detail that the cultural offer of a museum is welcomed and would benefit the area, however, consider that this could become part of a refurbishment scheme and would perhaps be better suited to an office use above. A copy of this letter is appended to this report.

30. Officers have considered the issues raised in both the petition and the letter received from Ward Members and these points are addressed within this report at the following paragraphs: loss of office paragraphs-63-78 concentration of student housing paragraph 98, economic activity paragraph 91, sustainability paragraphs 288-342, Destination City paragraphs 235-243. In regard to the developer having no prior experience of successfully delivering student accommodation officers consider that appropriate mechanisms such as Student Accommodation Management Plans, relevant conditions and section 106 obligations will ensure that an acceptable level of operation would be provided by any operator of the site due to these requirements being in place to manage and control its overall management and delivery.
31. 12 letters of support were received. These detail support for increasing visitor and resident numbers within the area, which in turn would support more activity at weekends and support local business, boosting the economy and housing supply, and bring diversity and energy to the area. Of these letters specific support has been raised by the Museum of London, the V&A Museum, Horniman Museum & Gardens and Derwent London in relation to the Migration Museum and the genuine benefit this would bring in providing a permanent, purpose built home for the museum.
32. The Aldgate Connect BID has also written a letter of support for the proposal stating that a proposal would bring much needed regeneration to the area, supporting businesses and encouraging economic growth in Aldgate.
33. A letter in support of the scheme has been received from the Eastern Cluster BID stating that the proposal would contribute to a mix of uses in the area, supporting the business opportunities of the area due to weekday and weekend activity, broadening the area's population mix and building upon emerging education related projects, cultural offers, supporting the Destination City initiative and contributing towards public realm enhancements in the area.
34. The Migration Museum board of trustees have also provided a letter of support detailed that the scheme presents a unique and exciting opportunity for them to deliver Britain's missing museum, a moving and inspiring landmark new cultural destination that showcases the long, rich and complex story of the movement of people. The letters also details that the Migration Museum have negotiated Heads of Terms with the applicant which would guarantee the Migration Museum space over three floors within the new development, rent and service-charge free for a term of 60 years, plus a guarantee to underwrite the museum's first three years' operating costs. The applicant has further undertaken to support the

museum's capital fundraising campaign with an initial donation of £0.5m - a enabling step that will permit the museum to engage a fundraising team. The letter also details that the partnership with the applicant affords the museum the considerable benefit of moving into a purpose-built space that it can co-design and be fit for their purpose.

Policy Context

35. 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.
36. The City of London has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. Onward progress of the Plan has been temporarily paused to enable further refinement, but it remains a material consideration in the determination of applications (although not part of the development plan) alongside the adopted 2015 City of London Local Plan and the London Plan 2021. The Draft City Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
37. Government Guidance is contained in the National Planning Policy Framework (NPPF) July 2021 and the Planning Practice Guidance (PPG) which is amended from time to time.
38. The Historic England Good Practice Advice notes, including Note 3 The Setting of Heritage Assets and Note 2 Managing Significance in Decision-Taking in the Historic Environment.
39. The Corporation recently adopted the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) which requires safety measures to be considered and incorporated where necessary.

Considerations

Relevant Statutory Duties

40. 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); and
 - 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).
41. 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).

42. National Planning Policy Framework (NPPF 2021)
43. The NPPF states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.
44. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
45. Paragraph 10 states that “at the heart of the Framework is a presumption in favour of sustainable development”. That presumption is set out at paragraph 11. For decision-taking this means:
 - approving development proposals that accord with an up-to-date development plan without delay; or
 - where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
46. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
 - the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - 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
 - 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).
47. 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.”
48. Paragraph 111 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.

49. 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.”
50. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.
51. Paragraph 134 sets out that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
52. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 152 identifies that the planning system should support the transition to a low carbon future. 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 the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
53. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 195 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal. Paragraph 197 of the NPPF advises, “In determining applications, local planning authorities should take account of:
 - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.”
54. 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.”

55. Paragraph 200 of the NPPF states “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
 - grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - 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.”
56. Paragraph 202 of the NPPF states “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.” When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting.
57. Paragraph 203 states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

Considerations in this case

58. In considering this planning application, account has been taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
59. The principal over-arching issues in considering this application are:
 - the extent to which the proposals comply with the relevant policies of the Development Plan; and
 - the extent to which the proposals comply with Government guidance (NPPF).
 - Any other material considerations.
60. Having regard for the above, the site-specific land use issues in considering this application are:
 - Principle of development;
 - Loss of office floorspace;
 - Provision Student Accommodation and Museum Use;
 - Economic considerations;

- Urban Design;
- Built heritage;
- Strategic views;
- Public Realm and Trees;
- Archaeological impacts;
- Access and Inclusive Design;
- Transportation and highway impacts;
- Waste collection arrangements;
- Environmental sustainability;
- Environmental Impact of Proposals on Surrounding Area (daylight, sunlight, overshadowing and solar glare; light pollution; wind; thermal comfort; contaminated land; noise; and air quality);
- Fire safety;
- Suicide prevention measures;
- Health Impact Assessment;
- Public Sector Equalities Duty;
- Human Rights Act 1998;
- The requirement for financial contributions.

Principle of Development

61. The Local Plan Core Strategic Policy states that when considering development proposals, the City Corporation will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
62. The loss of the current office floor space, and the change of use of the site to provide student accommodation with ancillary uses and the provision of a museum is to be considered.

Loss of Office Floor Space

63. The application site currently provides 6,949 m² GIA of office and ancillary floorspace arranged over basement, ground, and 4 upper floors. The building is currently occupied until March 2023.
64. The proposals seek the change of use from office (Use Class E) to primarily Student Accommodation use (Use Class Sui Generis) with additional uses including a Museum (Use Class F). The proposal does not include any independent office use, therefore resulting in the loss of 6,949 m² GIA of office and ancillary floorspace.
65. London Plan Policy E1 supports increase in current office stocks, especially within the central London office market. The City of London Local Plan 2015 and the proposed Submission Draft City Plan 2036

promote the delivery of a world class business city and the protection and provision of office floorspace. Local Plan policies CS1 and DM1.1 and proposed Submission Draft City Plan 2036 policies S4 and OF2 seek to protect existing office accommodation.

66. Policy DM 1.1, protection of office accommodation, requires applications be refused that would result in the loss of office accommodation where the site is suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate.
67. To meet the requirements of Core Strategic Policy CS1 and Policy DM 1.1, applicants proposing the loss of office accommodation will need to provide robust evidence relating to the current and long-term unsuitability of the site for office use and that the proposed change would not adversely affect the existing beneficial mix of commercial uses in the area or prejudice the primary business function of the City. Applicants will need to provide robust evidence to demonstrate that the building has depreciated such that office use is not viable or suitable in the long-term. Evidence will need to address the physical state of the building and its functional and locational obsolescence. Marketing evidence will be required to show that there is no recent or likely future demand for continued office use on a site.
68. Emerging Policies S4 and OF2 of the draft City Plan require the protection of existing office stock from being lost to other uses where the existing floor space would be viable in the longer term or where the loss would cause harm to the primary business function of the City.
69. Evidence provided in support of planning applications should take into account the potential for the building to meet a variety of office needs including, where appropriate, the potential for sub-division to provide smaller office suites, the potential to provide accommodation suitable for start-ups or 'move-on' accommodation and the potential for comprehensive redevelopment to re-provide office floorspace.
70. The Office Use Supplementary Planning Document sets out detailed criteria for evaluating the long-term viability of office accommodation and requires the submission of a viability appraisal and evidence of marketing in support of an application for change of use.
71. The applicant has submitted an economic viability assessment. The City Corporation appointed independent consultants to review the Assessment and provide advice to the City Corporation on whether the assessment meets the terms of Policies CS1 and DM1.1 and emerging policies S4 and OF2.
72. The applicant's viability assessment and the City Corporation's consultant review consider the viability of development at current day costs and values.
73. The applicant's viability assessment has looked at 3 development scenarios which have been compared with a benchmark land value (also known as the existing use value which includes an incentive for the landowner to bring the site forward for development). The benchmark land

value has been assessed as a net value of £36.2 million by the City's consultant derived from comparable office transactions in the City.

74. The scenarios tested are:

- Scenario 1: basic refurbishment of the existing office building
- Scenario 2: a comprehensive refurbishment of the existing office building
- Scenario 3: a redevelopment of the site to provide a new office building within the same building envelope as the proposed student housing scheme.

75. The table below compares the residual land value from scenarios 1-3 with the benchmark land value for this site. For a scenario to be viable, the residual land value should be greater than the benchmark land value. Where the residual land value falls below the benchmark land value the proposed development would be unviable.

Development Scenario	Residual Land Value	Benchmark Land Value	Surplus (Deficit) /
Scenario 1	£26,900,000	£36,200,000	(£9,300,000)
Scenario 2	£22,900,000	£36,200,000	(£13,300,000)
Scenario 3	£24,000,000	£36,200,000	(£12,200,000)

76. The City Corporation's consultant review demonstrates that scenarios 1, 2 and 3 all produce a residual land value below the benchmark land value for this site and therefore that none of the 3 development scenarios would be viable.

77. The City Corporation's consultant has not looked at the viability of the proposed student housing development but has considered the impact of delivering a museum as an integral part of an office redevelopment on this site. This 4th scenario has assumed that the museum will not deliver any value and the value from floors 1 and 2 of the office redevelopment scenario have been removed. The residual value from this scenario has been calculated at £4 million on current day assumptions, significantly below the benchmark land value and therefore not a viable option.

78. Overall, the City Corporation's consultant concludes that the none of the scenarios of retention of Friary Court in its existing office use, comprehensive refurbishment of this office use or redevelopment to provide new office space, are financially viable and therefore that this site would not be viable in the longer term for future office use. Also, that a mixed use office and museum scheme would not be viable. The principle of a change of use from office to an alternative use is satisfied in accordance with Local Plan policies CS1 and DM1.1, proposed Submission Draft City Plan 2036 policies S4 and OF2, and the Office Use SPD.

Loss of Basement Wine Bar

79. The proposed development would result in the loss of a basement wine bar space (use class Sui Generis) comprising GIA 364m². The bar is

currently accessed through a small door off Crutched Friars leading downstairs to a basement space where there is a bar area, small rooms located off this and ancillary spaces such as toilets and BOH.

80. The current basement bar, due to its location and lack of ground floor presence, does not particularly contribute to the activation of the street or provide an active frontage along Crutched Friars and has not been in operation since 2020.
81. Officers consider that the proposed museum use at ground floor would provide a significant increase in ground floor activation and active frontage along Crutched Friars, Northumberland Alley and Carlisle Avenue. As such, the loss of the basement bar to facilitate the implementation of the proposed museum is considered acceptable in this instance.

Student Accommodation Use

82. In considering the student housing element, regard must be had to the need for student housing, the suitability of the site for delivering student housing and the quality of accommodation that would be delivered.
83. London Plan policy H15 encourages the development of purpose-built student accommodation to meet demand in London.
84. Local Plan Policy DM21.7 and draft City Plan Policy H6 states that student accommodation would be acceptable where it would not prejudice the primary business function of the City, result in the loss of office (contrary to Local Plan Policy DM1.1), result in an excessive concentration of student accommodation, or have an adverse impact on the residential amenity of the area. Policy DM21.7 also states that proposals for purpose-built student accommodation should be supported by identified further or higher educational institutions operating in the City of London or CAZ.
85. London Plan Policy SD5 and Local Plan Policy DM21.1 states that residential development is not appropriate in defined parts of the City of London. The Local Plan identifies clustered locations for the delivery of future housing developments. The Local Plan recognises that a thriving residential community contributes to the City of London's vitality and makes it livelier and safer outside working hours. The application site is located 'near to' the Mansell Street residential cluster and policy DM 21.1 identifies this area as suitable for the provision of new residential accommodation, including student accommodation, to sit alongside commercial and other land uses.
86. The proposal would deliver 770 rooms of Purpose-Built Student Accommodation with ancillary communal spaces and external roof terraces. The accommodation and ancillary spaces would be provided over 20 floors above ground floor level. The 770 rooms would provide a mix of bedroom types including studios and cluster apartments, with 10% proposed to be wheelchair accessible. 35% of the units will be affordable, provided at a rent level capped by the Mayor of London, in line with London Plan policy H15.

87. Officers consider that the proposal would not result in a development which would prejudice the primary business function of the City and consider the proposal acceptable in this regard.
88. The proposed development would not result in a loss of viable office accommodation and would not be contrary to Policy DM1.1 for the reasons set out in the above section of this report.
89. Student accommodation contributes towards the City's housing target at a ratio of 2.5 student flats to 1 permanent residential dwelling. Therefore, the provision of 770 student flats would count as 308 residential units towards the City's housing land supply and delivery target.
90. The City's annual housing target is 146 dwellings per annum, therefore, 308 dwellings from this development proposals would equate to just over 2 year's housing supply.
91. The applicant has submitted an Economic Benefits Statement which as well as the wider benefits of the scheme also includes the added value generated by student accommodation. It states that students spend off-campus on a variety of goods and services including food, clothing, bars and cafes and that the presence of students in any particular area often coincides with the presence of retail and retail services which can add to the vibrancy and vitality of high streets and increase weekend and evening activity in an area making a valuable contribution to the wider economy as well as helping to support a safer and more welcoming area at night. The statement advises that the development could generate up to £5.3m in student spending every year thus supporting a total of 26 jobs.
92. There have been objections to the proposed development concerning potential disturbance from large numbers of students in the area and anti-social behaviour.
93. A draft Student Management Plan has been submitted which addresses traffic management, out of hours emergency management, security, working with neighbours to minimise disturbance, code of behaviour and conduct for students and refuse/waste management. The student housing will be managed 24/7 by a dedicated operator, by 6 full-time staff and contracted cleaning and security services.
94. Environmental Health have reviewed this application and have not raised any objection on the grounds of noise or disturbance to nearby occupants.
95. The City of London Police have confirmed that they are not aware of any significant issues that have been caused by the existing student accommodation located in Crutched Friars, nor do they believe are there any significant antisocial/crime issues caused by the site. The City Police's Designing Out Crime Officer has advised there may be opportunities to review detailed designs which may have potential to compartmentalise different areas, increase natural surveillance and provide some unofficial 'rule setting' principles. As such, it is considered that a condition to require the submission of details regarding the opportunities to design out crime are to be submitted for consideration by the City of London Police.

96. Officers consider that there would not be an unacceptable impact on the amenity of nearby residential properties and that there would unlikely be a significant rise in anti-social behaviour as a result of the student accommodation if the accommodation were to be run in accordance with a Student Accommodation Management Plan.
97. Concerns have been raised in relation to an increase in litter as a result of the student accommodation. Officers consider that as part of the final Student Accommodation Management Plan a strategy to ensure litter in and around the student accommodation is managed adequately.
98. If permission were to be granted a detailed Student Accommodation Management Plan would be required as part of the Section 106 Agreement to ensure a detailed and ongoing management of the student accommodation is provided.
99. Whilst there is existing student accommodation opposite the site, Officers consider that there would not be an unacceptable concentration of student accommodation in this area.
100. Proposals for student housing must be supported by identified further or higher educational institutions operating in the Central Activities Zone and provide accommodation for their own students.
101. The applicants have commissioned a Student Housing Supply and Demand Study which concludes that London's supply of Purpose Built Student Housing (PBSH) does not meet the accommodation needs to house London's students, with approximately 310,000 students having to find accommodation outside of the PBSH sector.
102. The applicant is currently engaging with local Higher Educational Institutions with an interest in securing at least a majority of the rooms at the proposed development. These discussions draw from the applicants' recent experience engaging with institutions to deliver other schemes in London. The applicant has also provided letters of interest from UCL and St Marys.
103. The applicants will need to ensure an arrangement for nomination rights with an appropriate higher education provider is secured for all of the proposed housing units prior to commencement through a S106 agreement in line with Policy DM21.7.
104. Policy H15(A)(5) of the London Plan requires that student accommodation provides adequate functional living space and layout. Local Plan Policies DM21.1(Location of New Housing) states new housing (including student accommodation) will only be permitted where development would not result in poor residential amenity within existing and proposed development.
105. The proposal includes a mix of studio, twodio, threedio and quod apartments. The studio rooms provide space for an en-suite, kitchenette, wardrobe, desks, shelving and storage. Other arrangements consist of a range of 2-4 bed apartments with space for shared kitchen facilities, en-suite rooms, desk, shelves and wardrobe space.

106. The internal daylight and sunlight conditions of student spaces and rooms contributes to the amenity of these space. The applicants have submitted an internal daylight/sunlight assessment of the building, including student bedrooms and communal spaces. The development has been optimised to reduce the number of north-facing rooms but because of the dense urban location, it is expected that not all rooms would meet the criteria set out by the BRE guidelines. Officers are concerned about the results achieved by a number of rooms, particularly those on the north and east elevations (fronting 80 Fenchurch Street as existing and Boundary House in the cumulative scenario), but it is reasonable to expect the rooms to fall below guidance in the dense city centre location, particularly where there are very narrow separation distances over Carlisle Avenue and the adjacency of the site to the east.
107. Officers consider that the building design has been optimised, particularly with regards the fenestration, to allow for the most reasonable light levels to the rooms whilst also successfully overcoming concerns around overheating in this tall building. The compromise between daylight levels and overheating is finely balanced and Officers consider that the applicant has successfully achieved the right balance in this difficult context. Further, it is considered that the access to well-lit communal spaces including indoor amenity and outdoor terrace spaces (plus two street level pocket parks) would satisfactorily offset the lower-than-expected levels of daylight and sunlight in some rooms, with the prospective students receiving an acceptable level of amenity from these spaces and their rooms combined. It should also be considered that the room layouts are recommended to be optimised with desks in front of the windows to enhance the light levels available for study (secured by condition), and that the students would spend a good portion of their time away at their university campus.
108. As such, officers, on balance, are satisfied that the internal daylight and sunlight achieved into student bedrooms would be acceptable in this instance as student rooms can be optimised through layout and students will have access to a diverse range of amenity spaces within the building. Further detailed analysis on daylight and sunlight can be found at paragraph 377 of this report).
109. The development would provide several different communal amenity spaces and external amenity spaces. The total communal amenity space provided is 1120m² arranged over 3 floors. The internal student amenities have been designed to promote neurodiversity through the provision of a variety of uses and space ranging from intimate to open plan areas to suit a wide range of student needs.
110. At ground floor level there would be a student entrance reception and breakout space/waiting area which would occupy an area of approximately 300m². The second floor area has been designed to facilitate quieter functions, these range from quiet study spaces, group study areas or workshop spaces and occupy an area of approx. 400m². A private, soundproof counselling room will also be provided at this level. The third floor provides space for more active uses, such as a cinema room, gym, games area, laundry space and a café and would occupy an area of

approx. 420m². The third floor is directly connected to an external communal amenity terrace. There would also be a communal amenity terrace provided at level 20.

111. Whilst there are no space standards for student accommodation, the development is considered to be fit for purpose and provide for student well-being and activities, ensuring a range of high-quality and accessible, internal and external, communal amenity space. The provision of purpose-built student accommodation in this mixed-use development would not prejudice the business function of the City, would not result in an excessive concentration of student housing and is not considered to have an adverse impact on residential amenity of surrounding properties. Whilst officers are concerned about the low level of light to some of the rooms and kitchen areas, on balance, officers are of the view that students would have the option of using amenity, breakout and study areas located throughout the building, along with the use of accessible roof terraces. The proposals also include 35% affordable student bedspaces and provides for 10% accessible rooms. On balance, the purpose-built student accommodation would accord with London Plan Policy H15, Local Plan Policy, CS5 and DM21.7 and Draft City Plan Policy HS6 and S23.

Migration Museum (Use Class F1 (c))

112. The Site falls within the CAZ and London Plan Policy SD4 outlines that within this area the unique concentration and diversity of cultural, arts and tourism functions should be promoted and enhanced.
113. The London Plan Good Growth objectives GG1 and GG5 are considered applicable to the provision of community and cultural use (museum) within development proposals.
114. Policy HC5 of the London Plan recognises that the continued growth and evolution of London's diverse cultural facilities and creative industries should be supported.
115. Emerging Strategic Policy S6 of the draft City Plan 2036 outlines that the City of London will support and encourage access to and development of a wide range of creative and cultural spaces and facilities across the City.
116. Emerging Policy CV2 (Provision of Visitor Facilities) of the Draft City Plan 2036 encourages the provision of facilities that meet the need of visitors in new cultural developments.
117. The museum would provide 3101m² of floor space arranged over part ground, first and second floor of the building to the Migration Museum. The museum space would function independently of the student accommodation and would have a separate entrance and clear identity at street level.
118. The Migration Museum have provided a letter in support of the application which details their plans to create a vibrant cultural programme of exhibitions, events, creative workshops and opportunities for building skills and career pathways, particularly within the creative industries, as well as

for corporate training and events. The Migration Museum anticipates the space will attract 140,000 visitors a year and have an annual economic impact of £8m.

119. The supporting letter also details that the museum have agreed heads of terms with the applicant to provide the space rent and service-charge free for 60 years and an initial donation of £0.5m.
120. A section 106 obligation would be required to secure the provision of a museum, including a museum management plan, opening hours and the securing of a museum partner, officers consider these obligations to be necessary to the delivery of the museum.
121. The proposed museum space would contribute to the cultural and community offer in this part of the City. It is therefore compliment with Policy HC5 of the London Plan and emerging Policies S6 and CV2 of the draft City Plan.

Urban Design

122. The development makes the optimal use of land relative to the constraints. The quality of the proposed elevations, mix of land uses, in particular the museum, public spaces, cycling provision and servicing operations would enhance existing site conditions through a design-led approach. The proposals would deliver a unique mix of uses which would complement the existing and emerging character of this wider area south of Fenchurch Street. The development would expand the existing student population and the museum and public realm proposals would enrich the existing learning and educational offer to deliver a vibrant wider neighbourhood, both during the day and at night, in accordance City's broader visions to deliver outstanding places, as part of 'Destination City', 'City Recharged' (2020), 'Future City' (2021) and 'Culture and Commerce' (2021). The proposals would also key into the Aldgate Connect BID (established 2020) and the Aldgate Connect Public Realm Vision and Strategy 2022 which include the City of London and Tower Hamlets. Aldgate Connect has a mandate to improve the public realm, strengthen the community and create a welcoming diverse identity.
123. The proposals make an effective use of limited land resource and enhance the buildings relationship with the adjacent public realm and townscape as well as connect with schemes recently completed (80 Fenchurch Street, Luminary Building Vine Street) and the proposed redevelopment of Boundary House which has a resolution to grant planning permission. The proposals are in overall general conformity with Local Plan strategic Policies CS10 (Design), London Plan Policies D3/D8 and emerging City Plan 2036 Strategic Policy S8 (Design).
124. It is considered the scheme would represent 'Good Growth' by-design, in accordance with the London Plan Good Growth objectives GG1-6, that is growth, which is socially, economically and environmentally inclusive.

125. The site falls within the heart of a traditional irregular network of historic streets which can be broadly defined by Fenchurch Street station and its viaduct to the south, Fenchurch Street to the west and Minories to the east. The surrounding streets of Crutched Friars, Northumberland Alley, Carlisle Avenue, Lloyds Avenue and Vine Street are distinctly quieter and more intimate, generally consisting of a denser collection of smaller urban grain of buildings, narrow alleyways and streets which are less trafficked compared to the busier main streets of Minories and Fenchurch Street with their larger building plots and higher footfall.
126. The surroundings in materials and architecture are varied including Edwardian, postmodernist and contemporary styles and midrise stepping down in scale from north to south towards the River following the topography of the land. Uses are predominantly commercial, but the streets are distinct from Fenchurch Street and Minories with an evolving more diverse identity. Existing and emerging uses along Crutched Friars includes educational, student accommodation and a recently approved hotel at Boundary House making it a complementary mixed use commercial area on the edge and around the 'foothills' of the City Cluster.
127. The existing Friary Court building is 36.2m AOD (5 storeys) The proposed maximum height for part of the building is 74.9m AOD (20 storeys).
128. Most buildings in the surrounding area are between 6 – 15 storeys in height, reflecting the mixed character of this area which mediates between the tall buildings of the City Cluster and lower developments which step down to the River. In the surrounding context 80 Fenchurch Street (77.7m AOD) is immediately north, to the southeast is Urbanest City Luminary (60.7 m AOD) and the recently approved application Boundary House immediately adjoins to the east on (64.09m AOD).
129. This proposed development is on the edge, but not considered a tall building under the adopted Local Plan (CS 14, para 3.14.1). This is currently defined as those which significantly exceed the height of their general surroundings. London Plan D9A policy states that the definition of a tall buildings is based on a local context.
130. Emerging draft City Policy S12(1), which has more limited weight, defines tall buildings as above 75m AOD. The proposed maximum height 74.9m AOD is technically below this tall building threshold. Quantifying this further, only 659sqm of floor space would be at a height of 74.9m AOD which equates to 2.12 % of the overall proposed GEA 31,062sqm. This taller part of the development is isolated and is immediately adjacent to the taller 80 Fenchurch Street. The development cascades down to 53.95 m AOD to Crutched Friars following the wider skyline contours and the natural topography from City Cluster to City Fringe.
131. The disposition of the final massing and bulk has been through a design led approach considering macro and local townscape impact. The massing and façade design have also been designed around the delivery of: good microclimatic conditions: daylight and natural ventilation to rooms; as well as creating opportunities for urban greening; and accessible amenity spaces.

132. The tiered stepped form would preserve strategic skyline views from the South Bank Queen's Walk in relation to the Tower of London, to respond to the former Port of London Authority building (grade II* and City Landmark) and proximity to the Lloyds Avenue Conservation Area.
133. From Queen's Walk, the Tower of London can be seen in the foreground in close proximity to the former Port of London Authority building, 10 Trinity Square. Together these buildings create a historic setting of warmly coloured Kentish rag-stone, Caen stone, and Portland stone. 80 Fenchurch, 1 America Square and 8-14 Cooper's Row form the mid-ground of the skyline and have light colouring and wider facades. In the background, and at a significant distance to the west, is the City Cluster, characterized by iconic silhouettes and metal and glass materiality. In these broad riparian panoramas, the proposal would sit comfortably in a consolidating transitional zone between the tall buildings of the City Cluster and the mid ground "foothill" developments stepping down to the Thames and the Tower of London.
134. The cascading blocks are shaped around a public courtyard to Northumberland Alley related to a museum space creating a C-shaped plan which references the existing site plan. The development incrementally steps down in height from north to south as a series of blocks. This arrangement positions the higher elements of the upper part away from Crutched Friars, Northumberland Alley and Lloyds Avenue Conservation Area. This is a direct response to the topography as well as to mediate between distinct townscapes and lower building scales around the site.
135. In approaches from the south, west and north the development would be experienced with other buildings of a similar or taller height or it's bulk would be partially screened. Approaching from the south along Coopers Row the development would integrate well and be comparable with 80 Fenchurch Street in the background and framed by taller buildings such as 1 America Square, or in closer views be partially truncated by the Fenchurch Street Station viaduct entirely obscuring the upper floors. Approaching from Minories along India Street the development would again be appreciated in the context of the taller 80 Fenchurch Street or be screened by Boundary House in the cumulative scenario. From Fenchurch Street and Aldgate Square only the very uppermost levels of the student accommodation would 'peep' above foreground buildings.
136. The north elevation faces 80 Fenchurch Street and fronts onto Carlisle Avenue. Due to the height and bulk of the adjacent buildings, notably the Boundary House proposal (for which there is a resolution to grant planning permission) and 80 Fenchurch Street, as well as the narrow surrounding streets, Northumberland Alley and Carlisle Avenue, this facade will have less prominence in the townscape.
137. Approaching along Jewery Street the curved alignment of the street and Boundary House as existing and proposed would mean the building would largely not be revealed until Rangoon Street. The development height steps down to 59.65 m AOD to Crutched Friars and would be experienced

in the context of the proposed Boundary House (64.09 m AOD) hotel scheme and 35 Vine Street (60.66m AOD) which are similarly scaled. The development would appropriately step down again to 53.95 m AOD at the junction with Northumberland Alley.

138. It is the immediate context from the southwest from Crosswall and Crutched Friars where the development would have the greatest visual impact. The development would clearly read in profile as a series of tiered volumes which progressively step down from north to south introducing a dynamic and articulated back drop to lower foreground buildings on Lloyds Avenue. Whilst there would be a significant change in scale with Marlow House and Sutherland House on Lloyds Avenue, this impact would be a fleeting kinetic experienced as part of the City Cluster as a backdrop.
139. Through the pre-application process the massing has been refined to improve this particular transition in scale and reduce the massing and increase articulation through reductions in height, chamfering of corners, setbacks and terracing at the upper levels and the insertion of the central courtyard to the west elevation. Visual impacts are further mitigated by the intricate facade detailing, more human scale of the residential proportions to the facade on the upper levels as well as the soft, warm colour palette of materials.
140. Northumberland Alley is narrow and has a particularly intimate character to which the existing private street trees and those in the enclosed sunken garden positively contribute. The development recreates this green breathing space as an accessible public courtyard and building heights of the student accommodation are set back from Northumberland Alley to be compatible with the finer urban grain and lower scale of existing buildings to the west of the site.
141. The public courtyard would be framed by the three storey Museum which defines the space and reads as a low pavilion (22.6m AOD). This scale and dimensions of the space and enclosing elevations are discreet from the student accommodation, providing an intimate human scale. The roof terraces and green roofs at third floor level above the pavilion reinforce this separation between Museum and student functions, making for a legible built form. Overall, the courtyard would create an inviting, useable space with seating and urban greening with a good quality of daylight to ground to enable use through all the seasons.
142. The proposal would be commensurate in height, scale and massing with other buildings towards the 'foothills' of the City Cluster. The development would also successfully mediate the changes in scale in its local context. The massing, height and footprint would integrate into the existing and emerging context and constitute the optimal use of a limited land resource in line with policies CS10 of the Local Plan, emerging Policy S8, and Policy D3 of the London Plan.
143. The proposed development is designed as a series of tiered blocks. The facades are well articulated, and the massing broken down into parts subdivided vertically into three volumes, and horizontally into four layers. The vertical volumes are articulated by pushing the building mass in and

out, as well as corner chamfers and further articulated by the distinctive curvilinear facade and high-quality materiality.

144. The architecture clearly distinguishes between the Museum and student uses. The Museum functions are expressed as a triple height a 'plinth' which anchors the development in the street scene and create a sense of prominence, legibility and human scale. Above the Museum is the student residential accommodation. These upper floors comprise of two residential parts as a stacked lower and upper volume. These parts have slightly different facade treatments, as well as setbacks, massing projections and roof terraces. This approach together with the cascading building heights breaks up the overall massing of the student accommodation and adds visual interesting from different townscape views.
145. The Museum elevations are highly legible and well-articulated would deliver active frontages compliant with Local Plan policies DM10.1, D3, and S8. Different facade types are introduced to express the interior program, responding to the street, marking entrances, and covering the loading bay. The active public spaces are outwardly well articulated and legible. The more active Museum elevations to Crutched Friars and Northumberland Alley have double height and double width glazed bays like "shop windows" set within colourful scalloped faience frames and GRC fluted surrounds which are highly articulated, expressive and provide decorative interest. This external treatment would be robust, signposting the presence of the public museum and making it outwardly inviting and eye catching in the immediate context and in longer pedestrian approaches in all directions to the site.
146. The main museum entrances are from the chamfered Crutched Friars corner with a celebrated portal and canopy. There are four additional glazed entrances from the Northumberland Alley courtyard which creates an inside outside space flowing into the public spaces.
147. The architecture elevates the Museum presence and distinguishes its sense of purpose from the student entrances and accommodation in the floors above. The large, glazed elevations provide excellent visual permeability, provide flexibility for displaying larger pieces and allow passers-by to see into the building into exhibitions and the mezzanine floor and activate the elevations in the round adding vibrancy and significant visual interest to the townscape.
148. There is a subtle change along the northern end of Northumberland Alley with smaller scalloped GRC framed windows defining the quieter active space of the café and shop and the upper level of the museum and the back house. A smaller secondary entrance is from the chamfered Carlisle Avenue corner. The north elevation to Carlisle Avenue continues the museum uses at ground floor and provides a strong and active corner junction with Northumberland Alley. The three-storey plinth wraps around the site to this elevation and brings continuity to the base continuing along Carlisle Avenue to house the service areas and student amenity space at second floor.

149. The facade of the ground floor has an attractive fluted geometry and additional layering creates the visual impact of a “frame-within-a-frame”. This layering would allow for relief shadow on the facade that expresses the facade’s depth and references the detailing of the buildings on Lloyd’s Avenue.
150. The main student entrance area and lobby is prominently located on Crutched Friars and wraps around Rangoon Street. The entrance would be highly visible and legible to users with good natural surveillance.
151. The stacked lower volume and upper volume facades of the student accommodation have an appropriately residential character with smaller proportions. The facade types have been developed to optimise their performance for natural ventilation and daylighting, while create a characterful, high articulated and contextual facade design.
152. The different facades of the student accommodation continue the fluid fluted geometry reflecting the fluted plinth but with smaller residential proportions. This repeating curve motif expresses the depth of the elevations and creates a vertical emphasis. The modular systems consist of different window and ventilation panel patterns. This creates variety between the facades and depending on the orientation and time of day the windows would shift in position between levels, creating an expressive play of shadows and geometry. The student accommodation is legible, highly articulated, well designed fit for purpose and will add visual interest to the local townscape and longer views on the skyline.
153. The materials for the plinth levels are simple, Ground Floor, Level 01, and Level 02, would be predominantly stone coloured glass reinforced concrete (GRC) and colourful accent faience and tiles which would give the building a distinctive, tactile and solid presence on the street. The colour palette for the student accommodation levels above will be a warm tone for the vertical metal ventilation panels, and a grey tone to match the GRC of the plinth levels. The vertical natural ventilation panels are proposed in aluminium to meet the demands of the natural ventilation airflow required and will be coated in a matte-finish powder coat that will have a low reflectivity to have a sensitivity towards the urban context and townscape particularly in long views on the skyline. The facade cladding material proposed is a combination of perforated aluminum with a high amount of recycled content and GRC with recycled content and cement replacement and further details are required as a condition.
154. Specifications for materials will maximise the practical ratio of recycled material and will ensure materials are reusable as a part of the materials passport approach secured via a condition. The proposed materiality, design details and intricacies would be secured through conditions including samples and mock ups of the fluted and metal bays for the Museum use and student accommodation.
155. The building has been designed with floor plates, servicing, cores and openable windows which enable maximum flexibility to follow “long life loose fit” principles. The Museum spaces within the plinth could be curated

and altered to adapt overtime and allow for experimentation. The upper floors are also flexible and could be adapted to extend the buildings life span and could support alternative uses.

156. Plan Policy DM10.3 (Roof gardens and terraces) encourages the installation of high-quality roof gardens and terraces. Emerging London Plan and Local Plan Policies G5 (Urban Greening) and OS2 (City Greening) require compliance with the Urban Greening Factor (UGF), a minimum score of 0.4 for residential development. The policies require major development to contribute to urban greening as a fundamental element of building design. Local Plan policy DM10.3 encourages high quality roof gardens and terraces where they would not adversely affect roof profiles, roof forms or impact on identified views.
157. The proposals incorporate two accessible roof terrace amenity areas for students. They have been designed to function as a shared outdoor roof terraces for all students. The first is located on level 3 and has a close relationship with the building courtyard at ground floor level. The second is at level 20, providing views towards the Southbank. The level three terrace provides an amenity area enclosed by lush green planters and small trees, comprising 175 sqm. The green planters also function as seating, creating a space for informal meetings, social interactions and relaxation. The level 20 terrace comprises 120 sqm and has been designed to provide both sufficient greenery and amenity for students. Outdoor seating is provided that can be utilised by students throughout the day. The remaining four roof terraces provide green and blue roofs. An element of PV is also anticipated to be located on the roof terraces at level 20.
158. The roof terrace locations and designs are well located making optimum uses of the flat roofs and designed with the lower terraces providing a visual contribution at a public pedestrian level. These elements are compliant with Local Plan policies, CS10, policy DM10.2 and DM10.3.
159. There would be minimal projections at roof level and the building is designed to have a strong silhouette which would be clutter free with attractive clean lines and the lift overrun below the main parapet. This is a considered response which satisfactorily integrates M&E plant and servicing, in line with policies DM 10.1 (6) of the Local Plan 20165 nd S8 DE2 of the emerging City Plan.
160. M&E plant and building services would be accommodated in the basement and at the upper level 20 supporting air source heat pumps a more sustainable approach to energy operations. At roof level the plant room would be orientated to the north facing Carlisle Avenue and integrated to the overall clean lines of the architecture. Further details are required as a reserve matter including the 5th elevation. Ventilation louvres also would be located on Carlisle Avenue at ground level adjacent to the servicing area. This would be treated as part of the art strategy to integrate the manifestation into the overall development and reduce visual impact and is considered to comply with DM10.1 (7) Local Plan 2015.
161. Emerging Strategic Policy S8 (1/2) seeks to optimise pedestrian movement by maximising permeability, providing external and internal

pedestrian routes which are pedestrian-focused, promote active travel, and create a safe, welcoming, attractive, convenient, comfortable and inclusive public realm. This is substantiated by emerging London Plan Policies D1, D4, D8 and G4, emerging City Plan 2036 Policies, D3, D4, S14 and OS1 and adopted Local Plan Policies CS16, DM16.2, CS19 and DM19.1, which seek to increase the quantity, quality and accessibility of public open space.

162. The proposed ground floor layout and design promotes an active and open façade, and prominent and distinctive entrances which make a positive contribution to the surrounding streets. The Museum in particular would have a prominent presence on the street, occupying the street corners at Carlisle Avenue and Northumberland Alley, and Crutched Friars and Northumberland Alley, that will create a liveliness in the public realm with its activity. The courtyard lies at the heart of the Museum use, creating a focal point that shapes the identity of the space and aids in wayfinding. The proposal is designed for flexibility, with potential for the adjacent internal uses to spill out into the courtyard as different events unfold.
163. The student accommodation arranged along Rangoon Street, with frontage onto Crutched Friars provides a suitable entrance. Locating the service bay along Carlisle Avenue would enable Rangoon Street to be pedestrianised if both this development and the proposed redevelopment of Boundary House come forward. In this case the plans for the pocket park would be developed further with the City of London and the adjacent Boundary House development. The pocket park shall be designed to consider spaces for sitting, relaxing and informal exercise.
164. The Aldgate Connect Public Realm Vision and Strategy 2022 identifies opportunities for pedestrian focussed interventions to the Vine Street character area which Crutched Friars adjoins. The application aligns with this strategy and the proposal includes several improvements to the public realm, including contributing approximately 244sqm of the Site to areas publicly accessible from the street. A new public space will be provided along Northumberland Alley of approximately 100m² that provides an accessible urban and green area at street level, providing more than just visual amenity, but also an occupiable space along the street. The additional public realm is proposed around the site planters and benches are integrated to the building plinth along Northumberland Alley and Crutched Friars, allowing the facade to be inhabited, increasing greenery along the street experience, and introducing greater solidity into the ground floor. They also form an integrated part of the HVM strategy that is designed into the facade concept, rather than added on.
165. The proposed courtyard space provides an opportunity to improve upon the existing condition by providing publicly accessible green space within the site boundary at street level, enabling the greenery to be enjoyed by all, and offering a moment of repose as one walks along Northumberland Alley. The space is designed for flexibility, such that the interior cultural/community space can spill out into the courtyard, celebrating the building program in the public realm and activating the street

166. In addition to the proposed 244sqm new public realm the proposal also enables delivery of a new pocket park on Rangoon Street to be further developed with the City of London and the adjacent Boundary House development. Because Rangoon Street is currently used by both Friary Court and Boundary House for servicing, the pocket park can only be delivered if both developments come forward and Rangoon Street is no longer required for servicing. If it can be delivered this pocket park would significantly upgrade the streetscape and the experience of spending time in the local neighbourhood; replacing what is currently a very visible back-of-house servicing area. Additional improvements to the public realm include widening of pedestrian footways, greenery planted along the building perimeter on Northumberland Alley and Crutched Friars, and three new street trees on Crutched Friars, pending further development and surveys of the conditions below ground
167. An art and signage strategy will be curated for the Museum as part of the cultural vision and delivery of a unique new cultural offer for the City of London. The plinth facade and public realm has been designed to integrate the potential for art piece signage that would showcase the character and presence of the Museum use and invigorate the streetscape with colour, creativity, and a sense of animation. The existing Friar statues at the corner of Crutched Friars and Rangoon Street will be removed and integrated into the strategy, such that they can continue to be enjoyed by all. Utility service doors and escape entrances would also be included within this strategy. Opportunities for heritage interpretation and informal active equipment within the expanded public realm will also be explored as part of the S278.
168. Cycle parking facilities are accessed via a prominent entrance on Rangoon Street within the plinth as part of the student entrance and lobby complex. Cyclists accessing the student accommodation will have a direct route to the basement level via a lift or stair, where cycle parking is accommodated. A cycle maintenance area will also be accessible at ground level from Rangoon Street. The short stay cycle parking is provided in various locations around the public realm. The active edges and improved pedestrian experience encourage walking. The proposals support active travel and comply with Local Plan policy DM10.1 and Emerging policies S8 (1) (2) (6) and DE2.
169. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City by night. Irrespective of the approved drawings, a detailed Lighting Strategy would be subject to condition to ensure final detail, including from, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy. The proposed public realm lighting strategy would provide low level illumination to architectural and landscape features, to enhance the pedestrian experience and improve safety.

170. Irrespective of the approved drawings, full details of the ground floor frontages, design and materiality of the public realm improvements and the public realm lighting strategy, public art and way finding strategy are reserved for condition to ensure these are well-detailed and are useable. The development has regard for Local Plan Policy DM 3.2 and the Mayors Public London Charter promoting a safe, inclusive and welcoming environment. Hostile Vehicle Mitigation will be built into the plinth of the building. Natural surveillance would be significantly increased through the active outward looking ground floor activities and the increased footfall during the day and evening due to the Museum use and student accommodation attracting a more varied user group to the area. A range of conditions require further final details to support safety, inclusiveness and wellbeing including lighting, entrances, HVM and suicide prevention and stewardship and management of the public spaces to address any potential anti-social behaviour.

Conclusion on Urban Design

171. The architectural form of the proposal would be commensurate in height, scale and massing with other buildings towards the 'foothills' of the City Cluster. The development would also successfully mediate the changes in scale in its local context. The cascading massing, highly articulated design, materials, colour and intended quality would add a level of richness and visual interest to the local townscape and skyline and would support the emerging vibrancy of the wider area.

172. Overall, the proposal would optimise the use of land, delivering high quality student accommodation and an exceptional and unique Museum space, whilst improving the buildings interface with its surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. It is considered the proposal would constitute Good Growth by design in accordance with Local Plan Policies CS 10 and DM 10.1, emerging City Plan Policy S8 and DE2 and London Plan D3, the policies contained in the NPPF and guidance in the National Design Guide, contextualized by the London Plan Good Growth objectives, GG1-6. The proposals would also align with the mandate of the Aldgate Connect BID by improving the public realm, strengthening the community and creating a place with a culturally rich and diverse identity.

173. The final details of the public realm including planting, wayfinding, heritage interpretation, art strategy, materials, lighting, opportunities for informal active equipment and management would be subject to conditions, planning obligations, management plans and the Section 278 agreement. The improvements to the public realm represent good place making and there would be gains quantitatively and qualitatively compliant with the NPPF design policies, London Plan policies, Local Plan policies, Draft City Plan policies, the City Public Realm SPD. The proposals would also align with the aspirations for Aldgate Connect BID and the Public Realm Vision and Strategy.

Strategic Views and In-Direct Impacts on Designated Heritage Assets

London View Management Framework (LVMF)

174. Local Plan 2015 Policy CS13 seeks to protect and enhance significant City and London views of important buildings, townscape and skylines. It seeks to implement the Mayor's LVMF SPG, protect and enhance views of historic City Landmarks and Skyline Features and secure an appropriate setting and backdrop to the Tower of London. Policy S13 of draft City Plan 2036 seeks similar and takes into account of the Tower of London World Heritage Site Management Plan (2016).
175. A Townscape, Visual and Built Heritage Assessment has been prepared and submitted as part of the application documents.

Impact on the Outstanding Universal Value of the Tower of London World Heritage Site and associated London View Management Framework Views

176. The seven overarching attributes of Outstanding Universal Value which are contained in the Statement of Outstanding Universal Value and 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 on setting are: i.) an internationally famous monument ii.) landmark siting and iii.) physical dominance of the White Tower.
177. The WHS Management Plan establishes a 'local setting area', an 'immediate setting' and a non-spatially defined 'wider setting'. The proposal 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 best exemplify the OUV, with management guidance providing a baseline for assessing change. The representative views/viewpoints include a number of LVMF viewing locations. Whilst being proportionate, this assessment adopts the assessment framework in the Mayor's 'London's World Heritage Sites: Guidance on setting' SPG, which is based on the relevant ICOMOS guidance, including the impact tables at Appendix 3 and 4, in conclusion.
178. The proposal would have an in-direct impact, via change in the wider setting of the WHS. Change is not necessarily harmful. That change will be apparent in a number of views including those from Tower Bridge, Queen's Walk, around City Hall and Potters Field and glimpsed from the Inner Ward of the ToL, from the southeast corner of Tower Green.

LVMF View 25A.1-3 – Townscape - Queen's Walk to the Tower of London

179. The proposal would be visible in the Townscape View from Queens Walk between Assessment Points 25A.1-3. This view is identified in the Tower of London WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of this view is the Tower, the identified Strategically Important Landmark, and it is deemed to best representation its OUV. The view includes other identified landmarks the Monument, visible upstream

and Tower Bridge, visible downstream. The silhouette of the Port of London Authority is distinctive and marks an important transition between the City and the Liberties, the defensive open space around the Tower. The juxtaposition of the modern cluster of towers including Tower 42, the Heron Tower and 30 St Mary Axe (aka the Gherkin), which are other landmarks identified in the LVMF, reflect the 900 years of history and this is considered a central characteristic of this view.

180. 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.
181. 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 (paragraph 186). The visual management guidance anticipates the consolidation of the Cluster which it is deemed will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (paragraph 187).
182. The site is located 350m northwest of the Tower of London World Heritage and would not impact on the Protected Vista from 25A.1 or the dynamic Protected Silhouette between Assessment Points 25A.1-3.
183. The Proposed Development is visible to the right of the former Port of London Authority building, largely concealing 80 Fenchurch Street from view. The height is comparable to that of 80 Fenchurch Street and below 1 America Street. The proposed development would be seen to progressively step down to the east and integrate with midrise "foothills" of City cluster and the existing and emerging skyline. The architecture of the proposed development will set it apart from the glass and steel office towers at Aldgate and those within the City cluster. The buildings orientation on the skyline and articulated plan form would result in contrast of light and shade across the elevations rather than a single flat elevation which would break down the massing in the skyline. The warm tones of the building's elevations contrast with the light stone of the former Port of London Authority helping preserve its legibility where it stands in front of the new backdrop.
184. The protected silhouette of the White Tower would be unaffected by the proposed development which will not detract from the World Heritage Site, which will remain the dominant feature of the view. The viewer will continue to be able to recognise the Tower of London and appreciate its Outstanding Universal Value.
185. The proposed development would not harm the characteristics and composition of strategic view or its landmark elements, preserving the ability of the observer to recognise and appreciate the Strategically Important Landmark, the Tower of London, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LVMF SPG and Protected Views SPD.

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

186. 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).
187. 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).
188. 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).
189. 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.
190. 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.

Other World Heritage Site views

191. 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. There would be a slight visibility of the uppermost storey from Tower Green southeast corner, but this would conceal an already visible 80 Fenchurch Street and there would be no adverse impact.

Dynamic Journey across Tower Bridge

192. 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'.
193. Viewpoints corresponding to this experience have been assessed in the submitted Townscape and Heritage Visual Impact Assessment (THVIA) 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, would appear where 80 Fenchurch Street is seen today, rising to a similar apparent height. It would appear as a stepped composition of forms, with the lower parts partially obscured from view by trees which will contribute to its visual separation from the White Tower. It will form part of the background urban layering or read as part of the low foothills to the main City Cluster. 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

194. 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

195. Historic Royal Places (HRP) were consulted on the application and have raised no objection. The proposal would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF. The extent of change the proposed development would have on the wider setting would be limited, the impact on the ability to appreciate the site's OUV would be neutral, and it would not harm the significance of the Tower of London whether in relation to the WHS, the individual listed buildings, or the Scheduled Monument. The proposals would accord with Local Plan

policies CS13, emerging Local Plan policies S11, London Plan Policies HC2, HC3, HC4.

10 Trinity Square (former Port of London Authority Headquarters) (Grade II*)

Significance:

196. The building is of more than special national interest and is of high architectural, historic, and artistic significance. Its design by noted architect Sir Edwin Cooper as the HQ of the Port of London Authority (PLA) in Portland Stone comprising a whole urban block completed in 1922. It was opened by Prime Minister David Lloyd-George, reflecting the strategic importance to the Nation of the PLA, who oversaw then the world's busiest port. The architecture comprises a monumental Beaux Arts classical idiom with maritime allegorical sculpture, including the centre-piece landmark tower with giant niche containing a representation of Father Thames triumphant, symbolically pointing towards the mouth of the river. It has a rich interior and hierarchy of spaces including original panelled corridors, board and chairmen's offices, amongst others.

Setting

- Elements of setting make a significant contribution to significance, in particular an appreciation of it, and these are considered: It has group value with Trinity House (grade I) located opposite, the HQ of the authority (by the same name) for lighthouses and navigation at sea, in a complementary Portland Stone Neo-Classical guise. Both enclose and define the semi-formal Trinity Square Gardens, laid out originally in 1795, symbolically containing the Mercantile Marine WWI Memorial by Sir Edwin Lutyens (grade I) and the post-WWII Merchant Seamen Memorial by Edward Maufe (grade II*). All together, these form a harmonious composition, of shared architectural language, comprising a dedicated mercantile ensemble or group of semi-formal character in the English Picturesque tradition, of which 10 Trinity Square is the defining centrepiece. This immediate setting is the principal element of setting which contributes to its significance.
- The tower element, when built one of the tallest in London, has a wider riparian setting where it is prominent alongside a series of monuments when viewed from the south bank (Queen's Walk) and the Upper Pool of London. This also makes an important, but secondary contribution to significance and an appreciation of significance.

Impact

197. The impact of the proposed development would be to the tower element which can be identified on the skyline from Queens Walk on the South Bank. The development would be to the right of the PLA building concealing 80 Fenchurch Street. The height of proposed development would be consistent with the descending roofline which characterises the east of the PLA and therefore would preserve the prominence of the PLA's tower and the ability to view it in conjunction with other landmarks in riparian views.

198. Overall, the proposal would preserve the special architectural, artistic and historic interest, heritage significance and setting of the Port of London Authority as a result of change in setting.

Lloyds Avenue Conservation Area

Significance

199. This is a small conservation area located directly to the west of the site. The Conservation Area is of architectural, historic, artistic and archaeological significance. This significance is summarised in the Lloyd's Avenue Conservation Area Character Summary and Management Strategy SPD as:

- an area with a rich history spanning a number of periods, relating to the medieval church of St Katherine Coleman; the East India Trading Company; and Lloyd's Register of Shipping centred around the irregular sweep of Lloyds Avenue, redeveloped in the Edwardian period into a fashionable row of larger speculative office buildings in the then established traditional City livery of Portland Stone-faced free classicism then associated with serious and dependable
- the landmark presence (in architectural and historic terms) is the Lloyd's Registry of Shipping occupying the corner at the northern end, in addition to its remarkable extension by Richard Rogers in the livery of his practice and in the sort of dramatic contrast which is at the heart of the City Cluster.
- the SPD references the private sunken garden on Northumberland Alley outside the conservation area which contributes to the peaceful and secluded character of the alley and contrasts to the busy thoroughfare of Fenchurch and classical grandeur of Lloyds Avenue.

Setting

200. In the main significance is contained in the intrinsic historic fabric and plan form of the (tightly defined) Conservation Area. A varied setting makes a lesser, modest, contribution to significance, namely an appreciation of it. These elements are:

- the natural topography provides a range of views into, out of, and within the conservation area. Taller buildings including the eastern cluster are often glimpsed in the background and terminate Northumberland Alley and Lloyds Avenue particularly 30 St Mary Axe. These contrasting visual experiences provide a dramatic change in scale and a setting which contrasts the historic with the contemporary City as a centre for trade and commercial activity. These elements of setting make a neutral contribution to the significance of the conservation area but have townscape value
- the southernmost fringe is defined by Fenchurch Street Conservation Area and the railway arches, and this provides an intimate industrial

and enclosed setting which makes a positive contribution in terms of the historic expansion of this part of the city through industry and trade.

201. largely the site is framed by 1980s and more contemporary commercial buildings which make a neutral contribution to significance the exception to this is the private sunken garden and street trees and greenery to the Northumberland Alley h are noted in Lloyds Avenue Conservation Area SPD. This is a soft and lush fringe to the eastern boundary which is loosely related to the former Rangoon Street, and this enhances the has more peaceful and secluded townscape character of the alley in contrast to the busy thoroughfare of Fenchurch Street. But does not contribute to the historic, architectural, or artistic values of the conservation area which are central to significance.

Impact

202. The development would be prominent in the background setting of Lloyds Avenue Conservation Area from Crosswall/Crutch Friars junction and in views along Northumberland Alley. In these experiences the development would form part of an existing dense urban backdrop and the stepped tiered massing from north to south following the local topography and responding to the lower scale of the Lloyds Avenue would be readily evident. The materiality and warm colouration, smaller residential façade components, and layering of details and verticality would also complement the Portland and hierarchical compositions of the traditional Edwardian buildings within the adjoining Conservation Area.

203. There would be change to the eastern setting on Northumberland Alley. The existing trees on Northumberland Alley are all on private land. The 4 trees on the pavement and the 9 trees within the sunken garden would all be removed. The development proposal includes the provision of new feature trees, three within the courtyard and three within the public highway on Crutch Friars; with a further twenty-three small trees located within roof terraces and at street level. The selected feature trees are more climate and disease resilient and able to support more varied biodiversity and have the ability to mature to Category A specimen.

204. The development would recreate a version of this space although smaller in size the courtyard would continue a sense of visual “green “relief to the edge and within the setting of the conservation area and to the townscape and intimate character of Northumberland Alley. The loss of the 13 trees and intense greenness and larger open space would be mitigated by the creation of a usable, inclusive, flexible and attractive new hard urban courtyard space.

205. The proposals would just be glimpsed in the background from the northwest end of the Conservation Area from Fenchurch Street looking east. These existing experiences are defined by a sense of enclosure of taller background buildings particularly 80 Fenchurch Street and the development would integrate with the existing setting of 80 Fenchurch Street and the glazed upper storeys of Roger Stirk Harbour building, 71 Fenchurch Street. The foreground buildings within the Conservation Area

would remain preserved and legible and there, whilst there would be no dilution of those identified elements of significance which contribute to significance.

206. In all visual experiences the development would not detract from the elements of setting which contribute to the significance of the Conservation Area. The Proposal would preserve the significance of the Conservation Area.

Fenchurch Street Railway Conservation Area

Significance

207. This is another small conservation area located directly to the southwest of the site. Its heritage significance lies principally in its inclusion of the first railway station to be built within the boundaries of the City of London as part of one of London's earliest railway lines. The Station front block is listed grade II and this together with the viaducts are the primary elements of significance. The Conservation Area is of architectural, historic, artistic and archaeological significance.

Setting

208. The Conservation Area is surrounded by late 20th and early 21st century office midrise and taller towers and a large, modern hotel south of Crutched Friars. Its local setting makes a very limited contribution to its significance other than Lloyds Avenue Conservation Area which forms a boundary and reflects the city expansion post industrial revolution. None of the local views from within the conservation area identified in the Fenchurch Street Station Conservation Area Character Summary and Management Strategy SPD are of relevance to this assessment.

Impact

209. Visibility of the development from within this small conservation area would be limited to its south-eastern end, specifically from Cooper's Row, under the railway viaduct, where the site's existing building and 80 Fenchurch Street appear beyond the modern office building at no.5 Lloyd's Avenue today. Views of the viaduct in conjunction with the development would be possible from Jewry Street / India Street and the north end of Crutched Friars but in all these contexts the development would read as part of varied townscape of midrise building which forms the existing setting.
210. In all visual experiences the development would not detract from the elements of setting which contribute to the significance of the Conservation Area. The Proposal would preserve the significance of the Conservation Area.

Other Local Views:

211. As a mid rise 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.

City Landmarks and Skyline Features

212. Policy CS13 (2) seeks to protect and enhance views of City Landmarks and Skyline features as identified in the Protected Views SPD. The proposed scheme would be visible in views of Port of London Authority and Tower of London. The proposed scheme would be a high quality, modern architectural backdrop to the Port of London Authority and preserve the visual primacy of the tower on the skyline blending with existing contemporary buildings which form their backdrops. The proposed development would not harm the characteristics and composition of the Tower of London as a landmark and skyline feature, preserving the ability of the observer to recognise and appreciate the Strategically Important Landmark. The development would be in accordance with policy CS 13(2) and associated guidance within the Protected Views SPD in this regard.

Non-Designated Heritage Assets:

213. There are no identified local non designated heritage assets which would be affected by the development.
214. As part of the consultation process the Twentieth Century Society suggest Friary Court should be a non-designated heritage asset. A response to this has been provided by the applicant. Comments relating to reuse of the building and circular economy are addressed elsewhere.
215. The potential architectural and historic values of the existing buildings have been assessed against the Historic England criteria for selecting non-designated heritage assets contained in 'Local Listing: Identifying and Conserving Local Heritage Advice Note 7'. The criteria comprise: assets type; age; rarity; architectural and artistic interest; group value; archaeological interest; historic interest; and landmark status. The assessment is summarised below.
216. Asset type and rarity: Friary Court is a purpose-built commercial building and therefore as a type is prolific in the City of London. In terms of rarity the current commercial buildings on the site are post-modernist of which there are many and more superior examples in the City of London.
217. Age: Friary Court was constructed in 1984 designed by Chapman Taylor Architects and is a boom period for building the City of London. The building has many of the typical architectural hallmarks of the postmodernist building period and is not considered to be unique and was extensively refurbished in 2009.

218. Architectural and artistic interest: Chapman Taylor were a pioneering architectural practice 1960s-1980s and projects include New Scotland Yard, Caxton House and the London Pavilion. Whilst Friary Court has some notable flourishes which are referred to in Pevsner including the big rounded glazed bay, slit and mullioned windows, corner oriel windows and a covered walkway which is gated and high quality these are typical of the post-modernist period. The previous water feature within the sunken courtyard, was removed in 2008, with the courtyard being relandscaped with hard standing.
219. Features which are of some limited interest include the private sunken garden and the Two Friars (1985) sculpture by Michael Black on the corner of Crutched Friars. The sunken garden loosely positioned on the former Rangoon Street would be recreated as a smaller but public courtyard and the statue would be removed and reinstated in a similar location. The pink granite- cladding is either polished and rough marble is some quality, and this would be salvaged and recycled as part of the Circular Economy materials passport considerations and controlled by a condition. Overall, the building is considered to have limited architectural and artistic interest
220. Group value: Friary Court is set in a diverse townscape of different building periods. There are other commercial buildings from the 1980s such as Jardine House to the west and 1 America Square to the south but there is no apparent architectural connection that would constitute group value.
221. Archaeological interest: The site does hold archaeological interest there is high potential beneath the current basement for localised and heavily truncated Roman and medieval cut features of low significance, as almost all archaeological remains were removed within its footprint as recorded during the archaeological investigation which occurred on site in 1982 (DUA 1982). There is moderate potential for Roman, medieval and post-medieval remains of low or medium significance in the area in the north-eastern part of the site outside the current basement. Appropriate conditions are attached to manage any archaeological outcomes before and during demolition and construction. In addition the S106 cultural plan requires the Museum to explore the potential for archaeology to contribute to the cultural strategy
222. Historic interest: Crutched Friars as a name derives from the priory that stood on its south side – this wider area was home to the Crossed Friars priory at Holy Trinity Aldgate. The site later became occupied by coach and stable yards and in the 19th. century warehouses and yards. The site and surroundings were severely bomb damaged and redeveloped in the 1980. Friary Court and the existing C- shaped plan is very loosely positioned on the historic route of Rangoon Street but largely the irregular shaped floor plate was not responsive to the former historic building pattern. The statue, the name of local streets and the name Friary Court all reference historic associations but the existing building is considered to have limited historic interest.
223. Landmark status: There are no identifiable communal or historical association or especially striking aesthetic values which make Friary Court

stand out in the local scene other than the sunken garden and the Two Friars statue.

224. Friary Court has limited architectural and historic values and it is considered does not meet the criteria to warrant non-designated heritage asset status. The existing 20th century building on Site makes a neutral contribution to local townscape. Those elements which do hold interest and have associations with the history of the Two Friars would be retained and reused on site in a similar location to existing or as in the case of the sunken garden this space reimagined and made more inclusive and accessible.

Other Designated Heritage Assets

225. The definition of setting is the extent to which an asset is 'experienced', which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is within the setting of an enormous amount of heritage assets, and it would be disproportionate to assess them all. As part of a scoping exercise, this assessment is in accordance paragraph 194 of the NPPF and is deemed proportionate and no more than is sufficient to understand the potential impact on significance. In accordance with paragraph 195 we scoped a number of potentially affected assets accounting for their significance and contribution of setting to that significance. This included:

- Lloyds Registry (Grade II)
- 6-8 Lloyds Avenue (Grade II)
- Front Block of Fenchurch Street Railway Place (Grade II)
- Church of St Botolph, Aldgate (Grade I)
- 43-44 Crutched Friars (Grade II)
- 42 Crutched Friars (Grade II*)
- Tower of London Conservation Area
- Trinity Square Conservation Area
- Crescent Conservation Area
- David Game College (Grade II)
- Trinity House (Grade I)
- 72-75 Fenchurch Street and 1 Lloyds Avenue (Grade II)

226. The settings and the contribution they make to the significance of these designated heritage assets, would not be adversely affected and/or any impact would not be over and above those impacts already identified. The proposed development would not harm the setting or the contribution that the setting makes to the significance of these designated heritage assets.

227. The assets assessed in detail here are considered sufficient to understanding the impact on significance overall.

Heritage Conclusion:

228. The proposal, by way of impact on setting, would preserve the heritage significance of heritage assets, and an appreciation of that significance. The proposals are considered to accord with Local Plan Policies CS 12 and DM 12.1, emerging City Plan policies S11 and HE1, London Plan Policy HC1, having accounted for and paying special regard to s66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF paragraphs 194-208.

Archaeology

229. Policy DM12.4 of the Local Plan 2015 and policy HE2 of the draft City Plan 2036 outline the requirements with regards archaeology, that the City will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking inclusive access to, public display and interpretation where appropriate.

230. An Archaeological Desk Based Assessment has been submitted with the application.

231. There was an archaeological excavation for the site in 1982 prior to the construction of the existing building. This revealed Roman, Medieval and post medieval features including Roman settlement, medieval cess pits and remains of medieval structures and also the foundations of the East India Tea and Drugs Warehouse. A basement was constructed as part of the 1980s development.

232. The scheme proposal includes a two-level basement which would cause ground disturbance mostly within the footprint of the current basement. In a small area (c 44m²) in the north-eastern part of the site, if unbasemented, the impacts of the proposals may be greater, and any surviving archaeological remains of the Roman period onward would be entirely removed. Archaeological evaluation is appropriate to provide additional information on the presence, depth, and character of archaeological remains and to inform an appropriate mitigation strategy.

233. The Archaeological Desk Based Assessment has been updated through the application to recognise the opportunities archaeological remains previously and potentially found on site, could contribute significantly to the cultural strategy. In line with existing and emerging policy Museum, architecture and public realm provide unique synergies for placemaking, exhibition themes, understanding and enhancing local character as well as meeting wider cultural and educational objectives.

234. The Greater London Archaeological Advisory Service (GLAAS) have recommended a pre-commencement condition requiring a timetable and scheme of archaeological evaluation to include: excavation, a watching brief and geotechnical monitoring. The S106 will also require collaboration with the Historic Environment Record Greater London to secure opportunities for inclusion of archaeology and public engagement on the site as a part of the cultural programme for the Museum and heritage interpretation across the site.

Cultural and Community Use

235. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 Strategic Policy S6 encourage new cultural experiences and art works. A Cultural Plan has been submitted in accordance with draft City Plan 2036 Strategic Policy S6.
236. The Cultural Plan has been developed around key policies and initiatives relating to the local area, these include Destination City, the GLA London Culture Plan and the Aldgate Public Realm Vision and Strategy (by the Aldgate BID).
237. The applicant has developed a coherent cultural proposal through engagement with local stakeholders and expertise from Future City who have developed the Cultural Plan submitted with the application. Future city's methodology for forming the Cultural Plan for 65 Crutched Friars included a stakeholder engagement programme. Key findings of the stakeholder engagement were:
- The importance of the site as an education hub.
 - The importance of activating weekend and evening economy.
 - The importance of the site enhancing the visitor experience with rich insights into the site's heritage and that of the surrounding area.
 - The importance of fostering meaningful collaboration through the programmatic offer of the site.
 - The importance of contested histories of decolonisation and migration – counterpointing and celebrating diversity in Modern Britain.
238. The Cultural Plan identifies cultural principles which have informed the design and programming of the space to be provided and fit with the identified cultural operator, which is to be the Migration Museum.
239. The applicant would be committed to providing 3103 sq m of Museum (Use Class F1(c)) arranged over part ground, part first and part second floor.
240. Dialogue with the Migration Museum has explored a potential ecosystem of cultural provision that it wishes to bring forward into a new set of spaces including temporary and permanent exhibition spaces, a café/shop, performance spaces, library and archives, spaces for the local community and artists, and spaces for education and workshops.
241. The Cultural Space would be integrated into the ground floor design fronting Northumberland Alley, with additional frontages facing onto Carlisle Avenue and Crutched Friars. The proposal offers a significant presence for the Migration Museum to create a cultural and community destination for the local area and London. It is important to note that the design of this space has been directly informed through dialogue with the Migration Museum to address their requirements
242. The Migration Museum board of trustees have also provided a letter of support for the scheme and details their involvement to date with the applicant team in ensuring the quantum of space and location is fit for

purpose and would ensure a viable museum could be delivered. The letters also detail that the Migration Museum have negotiated Heads of Terms with the applicant which would guarantee the Migration Museum space over three floors within the new development, rent and service-charge free for a term of 60 years, plus a guarantee to underwrite the museum's first three years' operating costs. The applicant has further undertaken to support the museum's capital fundraising campaign with an initial donation of £0.5m - a enabling step that will permit the museum to engage a fundraising team. The letter also details that the partnership with the applicant affords the museum the considerable benefit of moving into a purpose-built space that it can co-design and be fit for their purpose.

243. The details of management, final spatial layouts and final programme would be shaped by further engagement with the Migration Museum and would be secured by condition and S106 agreement obligations, such as a museum management plan.
244. The proposed museum would provide a destination cultural and community space which would contribute towards the Corporations Destination City initiative of creating fun, inclusive and innovative spaces and places that attract people to the City.
245. The proposed museum is considered to be an enhancement to the City's cultural provision and provide significant public benefit to residents, workers, and visitors. Having an identified operator who have been able to specify requirements at an early stage in the design process and a strong commitment from the developer to provide this space at rent and service charge free for 60years will ensure that this cultural space is deliverable.
246. As such, officers consider that the proposal would be in accordance with Policy CS11 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 Visitor Strategy, Policy DM 11.2 Public Art To enhance the City's public realm and distinctive identity.

Access and Inclusive Design

247. 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. In addition, the Local Plan Policy DM11.3, draft City Plan Policy CV3 and Policy E10 of the London Plan require hotels to deliver high accessibility standards.
248. An Access Statement has been provided by David Bonnett Associates (DBA).
249. The City's Access Officer has reviewed this application and identified a number of areas which require further consideration at a detailed design stage.

250. 5% of the rooms are proposed to be wheelchair-accessible from the outset and a further 5% wheelchair-adaptable (78 rooms in total). 32 of the wheelchair-accessible rooms would have left-hand transfers and 46 right-hand transfers, however it is preferable for there to be a 50:50 split of provision. Columns are also proposed within 17 of the wheelchair-accessible rooms and there are concerns they could obstruct access, particularly to the room and en-suite entrances.
251. It is pleasing that the wheelchair-accessible rooms are located on Levels 04 to 20, however only one of the rooms is proposed on the Northumberland Alley frontage. The majority of the rooms are proposed on the north-east side of the development which would lack a variety of choice for students.
252. It is recommended that 5% of cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1 guidance.
253. As such, a condition is required prior to the commencement of development for the submission of a detailed design and layout plan in relation to accessible design, this shall include detailed design choices, provision of accessible facilities, and layout of accessible flats across the development to ensure an even distribution.
254. Officers consider that a comprehensive accessibility management plan should be secured by condition and agreed prior to the opening of the museum to ensure that the design and operation of the space provides a fully inclusive space for all to enjoy.
255. Furthermore, a Changing Places facility should be provided if the capacity of an assembly, recreation and entertainment building exceeds 350 people. It is considered that the migration museum is likely to exceed this number and a changing places toilet should be provided. Further detail on this will be required by condition.
256. Therefore, subject to the inclusion of conditions, the development complies with 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. In addition, the proposals comply with the relevant parts (accessibility) of Local Plan Policy DM11.3, draft City Plan Policy CV3 and Policy E10 of the London Plan.

Transport and Highways

257. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. The site is located within a 3 minute walking distance of Aldgate East London Underground Station and Fenchurch Street National rail Station. Liverpool Street Station rail, underground and Crossrail services are within a 10 minute walk of the site. A number of bus routes also run close by on Aldgate and Minories and accordingly, the site is considered suitable in principle for the type and scale of development proposed.

Cycle parking

258. London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.
259. The level of cycle parking proposed as part of the development is compliant with the London Plan requirements, shown in the table below.

London Plan long stay cycle parking requirements	Proposed long stay cycle parking	London Plan short stay cycle parking requirements	Proposed short stay cycle parking
587	587	54	54

260. The long stay cycle parking for the Student accommodation is proposed at basement level with access available via a cycle lift from the Rangoon Street frontage of the site. All spaces would be easily accessible, and the lift is sufficient in size to accommodate multiple bikes without the need for them to be lifted up and down when accessing/egressing. The proposed plans indicatively show a mix of stands would be provided including 30 ground based Sheffield stand spaces with the remainder as two tier stacked spaces and vertical wall hung spaces. This mix of spaces is welcome and would ensure the storage is attractive and easy to use for all potential users of this facility. To ensure the cycle parking provided is of the highest quality, full details of the exact storage to be provided is recommended to be secured by condition.
261. Thirty adapted cycle space are proposed within the basement which would be located within the basement cycle storage area (in line with the London Plan Policy T5 (Cycling), London Cycling Design Standards 8.2.1, and the draft City Plan 2036 6.3.24).
262. Two long-stay spaces are required for the occupants of the museum/cultural floorspace, and these should be provided within the cultural floorspace itself. Full details on where these would be located along with associated lockers and showering facilities for these spaces are recommended to be secured by condition.
263. The proposals includes 54 short stay spaces all of which would be located within the boundary of the site. Five stands (10 spaces) would be located within a newly recessed area on the south eastern corner of the site adjacent to the Rangoon Street junction and three stands (six spaces) are proposed on the north western corner on Northumberland Alley. The remaining short stay spaces are proposed to be located within the cycle lobby on Rangoon street with some spaces within the long-stay cycle store at basement level. This is considered acceptable in principle however further details on how these internal short stay spaces will be managed are

required to ensure that they provide an attractive and convenient means of storage without compromising on the safety of the long-term storage. The applicant will be responsible for promoting the use of the cycle parking spaces and as such will be required by Section 106 obligation to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It will be submitted to the City for approval in line with the London Plan Policy T4.

Servicing and deliveries

264. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2036 Policy VT2 – 1 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.
265. As existing all servicing for the site takes place from the Rangoon Street carriageway, which is a short cul-de sac accessed from Crutched Friars. The geometry of Rangoon street is such that that there is insufficient space for larger vehicles (greater than 8m in length) to safely turn within this area in order to access from and egress onto Crutched Friars in a forwards gear. The import of this is that on the occasions that larger servicing vehicles are in attendance at the site they must reverse into Rangoon Street from Crutched friars in order to egress in a forwards gear.
266. The proposals seek to provide a new on-site servicing area to the rear of the site accessed from Carlisle Avenue which is a one-way street (westbound) servicing local traffic only. The servicing area would be sufficient in size to accommodate one servicing vehicle up to 8m in length (7.5t) entirely off-street with sufficient space for this to be comfortably loaded and unloaded.
267. The servicing area would not however facilitate vehicles turning within the site and they would be required to reverse into the off-street area in order to exit in a forward gear and this falls short of the requirements laid out in Policy DM16.5. The reversing manoeuvre would however be significantly shorter and safer than the existing situation on Rangoon Street. All movement would need to be suitably overseen by a trained member of the facilities management team. Vehicular traffic along Carlyle Avenue is low and whilst forming part of a cycle route levels of cycling activity are not significant. Importantly, the new cycling storage entrance would be located off Rangoon Street which would not result in additional cycling activity being loaded onto Carlyle Avenue.
268. Using TRICS survey data for comparable sites across London, the applicant estimates that there will be an average daily requirement of 25 vehicles per day attending the site in association with the student accommodation use as well as 3 deliveries per day for the museum use. Given the proposed changes of use it is expected that there will be a change in the profile of deliveries to the site with a reduction in pre-arranged deliveries and an increase in the number of independent deliveries associated with individual students residing within the building.

The Delivery and servicing plan indicates that students will be required to direct these vehicles to the loading area to the rear of the site, however given the nature of such deliveries it is considered that it would be impracticable for some of these deliveries to take place within the on-site loading bay. There are however considered to be sufficient on-street waiting and loading opportunities around the site to accommodate this expected activity on the local Highway for short periods of time while parcels are being delivered. A robust parcel delivery strategy, including the use of a designated parcel drop-off facility must be secured as part of the DSP to ensure that any deliveries not making use of the on-site facilities are streamlined and that vehicles are not be required to wait on the local highway for prolonged periods of time.

269. The undercroft at the junction of Carlyle Avenue and Crutched Friars as existing is 4.11m in height. It is not considered that the proposals would introduce additional activity inconsistent with this height constraint. It should be noted that recent planning proposals for the adjacent Boundary House site, which have a resolution to grant, would increase this over sail to 5.7m if implemented which would ensure compliance with minimum height requirements.
270. The proposal will require a new vehicular crossover on the southern footway of Carlisle Avenue. This will require the relocation of 2 Visitor parking bays which will be required to be relocated on the wider local highway network and this will be dealt with as part of the S278 agreement secured within the S106.
271. 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, for all pre-booked deliveries in line with the City of London Transport Strategy. Cargo bikes would be permitted to access the proposed internal off-street servicing area during these times.
272. The development will be required to produce a delivery and servicing plan (DSP), and this would be secured by Section 106 obligation.
273. Overall, it is not considered that the proposed servicing arrangement would result in any undue implication on the public highway, nor highway safety in general. Whilst the proposals do not comply with Policy DM16.5, this must be balanced against the removal of servicing activity from Rangoon Street and the delivery of other public uses at ground floor.

Car parking

274. 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.
275. The development is car free with one blue badge bay to be provided within the development which would be sited adjacent to the Servicing Yard on Carlyle Avenue.

Trip generation

276. A trip generation assessment has been conducted for the site. The assessment has used TRICS data for similar developments in London with a PTAL rating of 6B which are considered suitable comparator sites. It is predicted that the total number of trips to the development would be 1053 per day, which is an overall increase of 151 daily movements when compared to the existing. It is predicted that the peak AM period for the proposed student accommodation would be between 10:00 and 11:00 where there would be a total of 84 two-way movements. The PM peak is identified as between 17:00 and 18:00 with a total of 96 two-way movements. Given the accessibility of the site it is considered that this additional level of activity could be comfortably absorbed by the existing highway network and local transport network.
277. The Transport Assessment identifies that there would be an expected increase in taxi activity around the site when compared with the existing office use with 15 taxi trips expected across the site. This figure is considered to be a robust assumption of expected vehicular activity given the accessibility of the site and there are sufficient suitable locations around the site to facilitate this level of activity without any undue impacts upon local highway conditions.
278. The Applicant has submitted an outline Moving in/out strategy within the Transport Assessment which includes a number of measures to manage and mitigate the impacts on the highway network, including staggering move in and out times. A robust and comprehensive Moving in/out strategy must be secured by 106 through the student management plan with details to be discharged prior to occupation.

Public Realm and S278 Agreement

279. The following shall be included within the scope of section 278 works associated with this development proposal:
- Relaying of footways along site frontages on Northumberland Alley, Carlisle Avenue and Crutched Friars
 - New vehicular crossover on Carlisle Avenue
 - Traffic Management Order changes for new vehicular access points

- Planting of three new street trees on Crutched Friars
 - Improvement works to Rangoon Street to create a new pocket park, including changes to the Traffic Management Orders to permit pedestrians and cyclists only.
280. The pocket park delivery is subject to both this development proposal and the adjacent development proposal at Boundary House being implemented due to the existing servicing conditions of each building respectively. In the event both schemes are implemented it is considered that the delivery of this pocket park in the removal of a redundant servicing road is necessary to make the development acceptable, however, if only one scheme were to come forwards further consideration would need to be given to the scope of 278 works on Rangoon Street.
281. As part of the application a new area of public realm is proposed along Northumberland Avenue. The submission of a public access and management plan of this area of new public realm would be secured through a Section 106 Obligation.

Construction Logistics Plan

282. 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

Transportation Conclusion

283. Subject to conditions and planning obligations, the proposal would accord with transportation policies including London Plan policies T5 cycle parking, T6 car parking. It accords with the Local Plan 2015 Policy DM3.2, and the draft City Plan 2036 Policies AT1, AT2, AT3, and VT3. The proposals do not accord with DM 16.5 however on balance the proposals are considered acceptable in transport terms.

Waste Collection Arrangements

284. Local Plan policies CS17 and DM17.1 require sustainable choices for waste and for facilities to be integrated into building design. Draft City Plan policies S16 and CE1 requires developments to consider circular economy principles.
285. A Delivery and Servicing Plan, prepared by Pell Fischmann has been submitted as part of this application which sets out the servicing and waste collection strategy and has been developed in consultation with the CoL highways and waste officers. The proposed development will be serviced on site with all deliveries and refuse collection activities being carried out at ground floor level, accessible via Carlisle Avenue.

286. The Cleansing Team have reviewed the waste collection arrangements and confirmed the proposed waste storage and collection facilities in Drawing No. 65CF-3XN-XX-DR-AX-1200 Rev 00 and 65CF-3XN-XX-DR-AX-1200 Rev 00 comply with the City's requirements.
287. The waste storage is considered to comply with Local Plan policies CS17 and DM17.1 and draft City Plan policies S16 and CE1.

Sustainability

Circular Economy

288. 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. The Local Plan Policies CS15 and DM 17.2 set out the City's support for circular economy principles.
289. A pre-redevelopment audit has been undertaken for the site to explore whether the existing building can be retained, refurbished, or incorporated into the new development.
290. The assessment of the existing structure identified significant challenges for the continued use as an office development, to include:
- Narrow and irregular floorplates and core locations
 - Lack of insulation to the façade
 - Low EPC rating
 - Structural limit of 4 additional floors.
291. The applicants do not consider that the existing building would deliver optimal space for high quality office space, in addition to not being able to facilitate additional floorspace to the proposed quantity. In order to comply with recent regulation changes, the requirements for an additional core, new facades and full strip out would cause significant demolition and carbon emissions, in particular through additional strengthening of the building frame and through new facades.
292. The proposed change of use to student accommodation has been assessed against a number of development options to understand the impact on the extent of demolition, re-use and carbon emissions. The options are:

Scenario 1

293. Deep refurbishment including the retention of the substructure, frame, roof and parts of the slabs of the existing, and the replacement of the building services and fabric designed in line with modern standards (all electric building, energy performance in line with the London's Energy hierarchy). Vertical extension with four lightweight modular, additional floors.

Scenario 2

294. Deep refurbishment of the east and south wing of the existing building, with the addition of four extra floors on top of the existing structure. Replacement of the northern wing. The new building is composed of 16 to 20 storeys.

Scenario 3

295. Deep refurbishment of the south wing of the existing building with the addition of four extra floors on top of the existing structure. Replacement of the northern and eastern wing. The new building is composed of 16 to 20 storeys.

Scenario 4

296. Demolition of the existing building and the construction of a new building retaining the basement walls of the existing building.

297. These scenarios have been assessed in terms of their performance in four key areas – Carbon, Circularity, Energy and Value + Functionality. The energy and carbon emissions performance of the options is summarised in the Whole Life-Cycle Carbon emissions chapter.

298. With regard to circularity, in order to adapt the building for a future use as student accommodation, the options assessment identifies significant need for demolition, alterations and complicated engineering for any building parts to be retained. The existing grid, cores' locations and basement constraints would significantly reduce the quality of the new development (functionality efficiency, future resilience, etc.). Additionally, due to the loading constraints of the existing building there is a limited number of extra floors that can be added on the top of the existing building which results in limited site utilisation. Therefore, this application is based on scenario 4, a new development partially retaining the substructure of the existing building. A pre-demolition audit has been undertaken to identify the re-use opportunities on site, and an upcycling catalogue has been produced to examine the reuse and upcycling options for the valuable materials on site.

299. The submitted Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions into the proposed new development, in accordance with the GLA Circular Economy Guidance.

300. The new development is designed for a long lifespan and would include a range of circularity principles including:

- Flexibility and adaptability: the proposed building floor plate could be adapted to accommodate a hotel or residential units varying from 1 to 3 bedrooms.
- Replaceability: modular design with offsite fabrication and potential for disassembly for part replacement, and accessibility to building services
- Climate resilient design
- Development of upcycling strategies following the undertaken pre-demolition audit that results in the expectation to divert 95% of

demolition materials from landfill. This includes the preparation of material passports for elements identified as materials with high-reuse potential

- Development of material passports for all new materials to facilitate future reuse.

301. An update to the detailed Circular Economy Statement including results from the detailed design phase and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved have been requested by conditions.

Operational energy strategy and carbon emissions

302. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an overall significant 70% reduction in regulated carbon emissions compared with a Building Regulations 2021 compliant building.

303. The proposed energy demand reduction strategy includes the following:

- Insulation values equal to or better than the Notional Building (Part L),
- All spaces modelled to have natural ventilation
- LED light fittings with daylight compensation controls within common rooms and office spaces
- High performance insulation applied to the heating and domestic hot water pipework within common areas to minimise heat loss and reduce the risk of overheating

304. The strategy would cumulatively reduce the building's operational carbon emissions by 9% compared to a Building Regulations 2021 compliant building. This would increase to 9.7% as Wastewater Heat Recovery is proposed in addition (which should not be included within the Part L calculation). This would come very close to the GLA energy efficiency target of 10% for residential development.

305. The risk of overheating is reduced by incorporating natural ventilation through ventilation panels supported by mechanical extract from the air handling units for student rooms. The student amenity spaces and suite generis spaces would be actively cooled via variable refrigerant flow (VRF) systems.

306. To avoid the risk of overheating in particular to the studios, rooms with large, sun-facing glazing areas, single aspect and limited openings for natural ventilation should be avoided where possible. The student rooms were assessed in accordance with CIBSE TM59 (methodology to assess overheating risk in homes) using worst case samples on the 18th floor facing west. The assessment indicates that the rooms would comply as ventilated spaces with open ventilation panels. However, due to external noise levels that may prevent open ventilation panels at times, overheating would be prevented by mechanical extract from the air handling units.

307. The facade system in particular is still under detailed design review, both in terms of operational and embodied carbon impacts resulting from the

incorporation of ventilation panels, the need for solar shading, the types of the façade system and materials. A condition is recommended to request further details to reduce carbon emissions from the proposed facades.

308. 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.
309. In relation to renewable energy technologies, a system of low and high temperature air source heat pumps at roof level would provide space and domestic water heating, resulting in further 61% carbon emissions savings compared to a Building Regulations compliant building. This high level of carbon emissions savings is due to the fact that space and domestic water heating form the majority of energy loads of student accommodation use and therefore, when delivered by renewables, would result in a significant reduction in carbon emissions. The energy statement incorporates an area of 100sqm of PV panels that also contribute to the reduction in carbon emissions.

Energy Use Intensity (EUI)

310. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For residential uses, the recommended values are an EUI of 85 kWh/m²/year (good practice) and 100kWh/m²/year (typical practice). The estimated EUI from the entire proposed development (mix of commercial and residential) is 138 kWh/m²/year, with the major contributors to the building's increased energy consumption being small power (unregulated energy demand) and the domestic hot water system. This includes the commercial spaces. Assessing the student accommodation on its own as the residential use part of the building, the EUI would only be 77 kWh/m²/year which improves on the good practice benchmark. There are no benchmarks for commercial residential buildings as yet. The EUI resulting from the space heating would be 6.2kWh/m² under Part L model and 4.51kWh/m² under TM54, both being below the benchmark of 15kWh/m²/year.
311. The site-wide energy strategy significantly exceeds 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

312. A BREEAM New Construction 2018 (fully fitted) pre-assessment has been prepared, targeting an "outstanding" rating. The assumptions made as part

of the preliminary pre-assessment indicate that the proposals can meet all the mandatory level requirements for the “outstanding” rating including a score of at least 91.1%. The pre-assessment is on track to achieve a high number of credits in the CoL’s priority categories of Energy, Water, Pollution and Materials, as well as the climate resilience credit in the Waste category.

313. Further credits are intended to be targeted in the detailed design and fit-out phases of the development, and in particular, further credits can typically be achieved in the Materials, Land Use & Ecology and Pollution categories.
314. 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.

Whole Life-Cycle carbon emissions

315. 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-zero carbon target.
316. The assessment of the 4 development scenarios for the site as set out in the Circular Economy chapter has been underpinned by a quantitative assessment of whole life-cycle carbon emissions of each option.
317. The options are different in their extent of retention and subsequent works to demolish, adapt and alter the existing fabric plus the addition of new structure, however, the assumptions about the proposed new building elements, building services and finishes/fittings for those works align in each option, with the exception of assumed greater operational carbon emissions for Scenario 1 due to its potential lack of optimisation of the internal space for energy performance. The methodology complies with the draft Whole Life-Cycle Carbon Optioneering Planning Advice Note.
318. The resulting embodied, operational and whole life-cycle carbon emissions from the assessed options are set out in the applicant’s table below. The

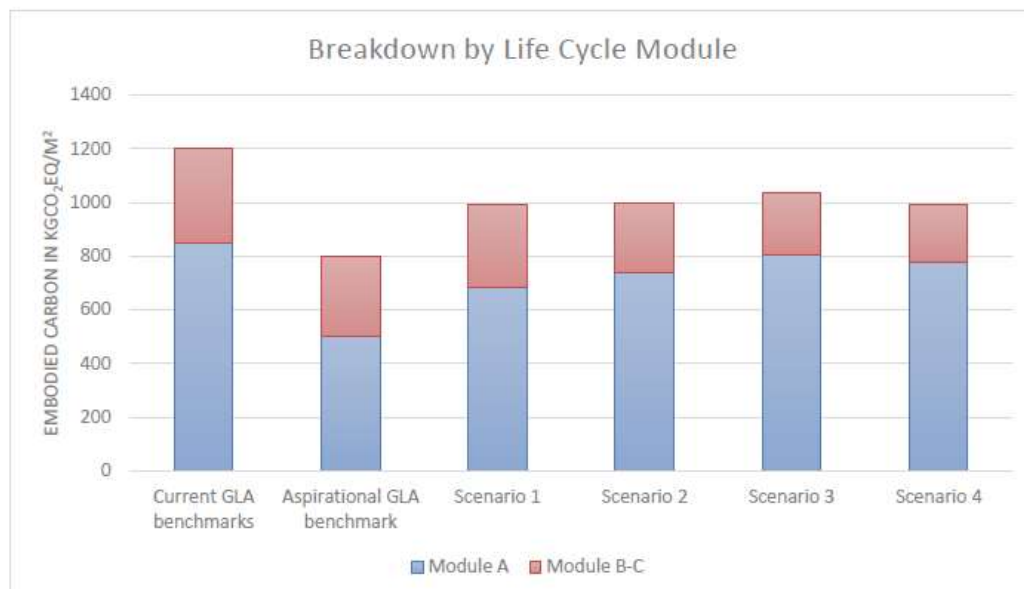
overall total whole life-cycle carbon emissions would be highest for Scenario 4 (new building), followed by Scenario 3, 2 and 1, while the emissions per square meter would be slightly higher for Scenario 3 (retained south and east wing and new building) compared to Scenario 4, but it would be highest for Scenario 1, due to the high operational carbon emissions as explained above.

Table 4 Overview of the embodied carbon results for the four assessed Scenarios

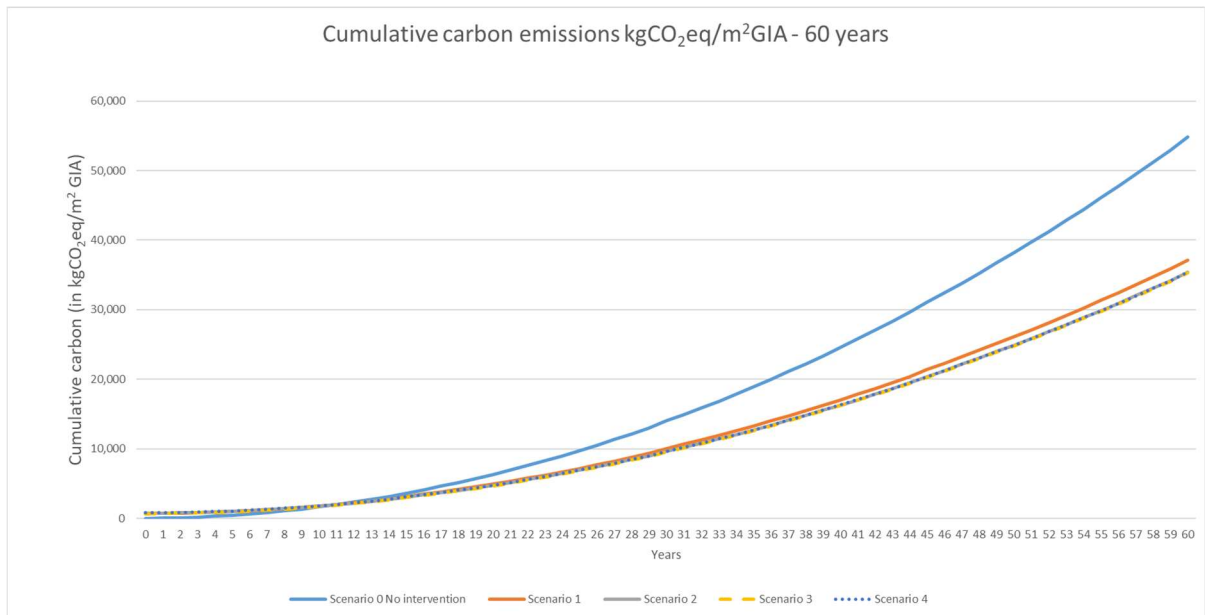
	Scenario 1	Scenario 2	Scenario 3	Scenario 4
kgCO₂eq/m²				
Whole Life Carbon	2,733	2,186	2,228	2,163
Operational Carbon	1,183	1,126	1,126	1,126
Embodied Carbon	946	1,003	1,102	1,037
Tonnes CO₂eq				
Whole Life Carbon	29,385	42,093	50,046	60,218
Operational Carbon	16,325	22,263	25,298	31,352
Embodied Carbon	13,060	19,830	24,748	28,866

319. The graph below compares the options with the GLA benchmarks for embodied carbon emissions of residential buildings. When considering the emissions per square meter, all scenarios would perform better than the Standard Benchmark but would not meet the Aspirational Benchmark.

Figure 31 Breakdown of the embodied carbon results by life cycle modules and comparison with the GLA current and aspirational benchmarks



320. The whole life-cycle carbon emissions of the 4 scenarios plus the “no intervention” scenario over a 60 year life span per square meter are shown in the graph below. Scenarios 2, 3 and 4 perform at very similar levels.



321. While the different sizes of the Scenario schemes 2-4 result in greater differences in the absolute figures (see applicants' table 4 above) – the highest being Scenario 4, the lowest, Scenario 2 - these have to be balanced against other environmental benefits such as:

- Achieving circular economy principles and lower embodied carbon emissions through a standardised, material efficient fit-out of the rooms
- Provision of opportunities for urban greening and biodiversity on multiple roof areas
- Provision of opportunities for flexibility and longevity of the new floorspace compared to spaces constraint by the existing column grids.

322. In tandem with viability testing (set out elsewhere in the report) that has been carried out for office refurbishment, retrofit and office redevelopment, the applicants' decision therefore was made to redevelop the site as per the application proposal.

The application proposal:

323. The submitted Whole Life-Cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table below. The results show that the upfront embodied carbon emissions can be reduced beyond the GLA's Standard Benchmark, however, the embodied carbon emissions from the in use and end of life-cycle stages would not meet the Standard Benchmark at this stage. The current in-use stage carbon emissions (module B) is based on available defaults as part of the software due to unknown realistic figures at this stage. They are therefore on the high side compared to the GLA benchmarks, however this can be greatly reduced once detailed design work is undertaken and operating protocols are put into place. It is the intention of the developer to own and operate the building and the detailed material selection with have high lifespans and low maintenance cost will

be considered in the next stages. An update has been requested by condition.

324. Embodied carbon emissions at planning application stage:

Scope	Proposed Redevelopment	Benchmark	GLA Benchmark
RICS Components	kgCO2/m2	kgCO2/m2	
A1-A5	693	850	GLA Standard (Residential)
		500	GLA Aspirational (Residential)
A-C (excluding B6-B7)	1305	1200	GLA Standard (Residential)
		800	GLA Aspirational (Residential)
B6-B7	1235		
A-C (including B6-B7)	2540		

325. These figures would result in overall whole life-cycle carbon emissions of 70,723,760 kgCO2 being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for 34,394,988 kgCO2. 51% of the overall impact would be associated with embodied carbon and 49% of the overall impact would be associated with operational carbon emissions.

326. The largest contributor to the overall embodied carbon emissions of the proposal is the superstructure with 42% (half of which associated with the façade), followed by the building services and fittings, furnishings & equipment with 28% and 14% respectively. The substructure and finishes would be responsible for 7% and 6% of embodied carbon respectively.

327. Over the proposed building's whole life cycle, the embodied carbon emissions calculations at planning stage demonstrate a reduced amount of upfront carbon emissions compared to the Greater London Authority's Standard Benchmark emissions target. It is anticipated that during the detailed design stage further improvements can be achieved, in particular in the product stages A1 – A3 of the building's life cycle by careful choice of locally sourced and low carbon materials including EPD's (Environmental Product Declarations) as well as by using refrigerants for the heat pumps with a low global warming potential. 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.

Climate Change Resilience

328. Daylight and sunlight are key considerations in the proposed development, and a balance between daylight and overheating must be achieved. It is noted that glazing in the lower volume is greater than in the upper volume to improve delivery of natural light, whereas the upper volume façades have been optimised to limit excessive solar gain, including a deeper recess in the façade to provide an element of solar shading. Natural ventilation is provided using a perforated façade panel, designed to further prevent excessive solar gain.
329. The proposed development is at low risk of all types of flooding. Ground level sustainable drainage (SuDS) opportunities are limited at this location, in particular infiltration elements. However, stormwater runoff attenuation is proposed in the form of a blue/green roof (using geocellular storage system), combined with an attenuation storage tank at basement level. A small, soft landscaped rain garden is also proposed off Northumberland Alley.
330. The proposed development will incorporate rainwater recycling for WC flushing and soft landscaping irrigation, make use of the attenuation tank at basement level. Low water fixtures/fittings, water metering and leak detection are also proposed. 4 of 5 BREEAM Wat 01 credits are targeted, aiming for a 50% improvement over baseline performance (L/person/day); overall, 8 of 9 BREEAM water credits are targeted.
331. The proposed development achieves an Urban Greening Factor score of 0.39 (using GLA factors) or 0.42 (using CoL factors). There is a positive mixture of intensive and extensive green roof elements. The DAS recommends the installation of a number of open-fronted nest boxes (for black redstarts) and swift bricks to support bird species, and these should be secured, potentially by planning condition.
332. The proposed energy strategy is comprised of all-electric air source heat pumps with some rooftop solar PV, with no routine fossil fuel combustion. However, it is unclear whether backup diesel generators are included; these would be relevant to future climate change if increased frequency and intensity of heatwaves lead to increased strain on the energy grid.
333. The proposed development is targeting the BREEAM 'Outstanding', including the Wst 05 credit 'Adaptation to Climate Change'. However, no report in support of Wst 05 is yet available, and therefore no separate, specific details outlining how the development has been designed to be resilient to future climate change have been provided
334. The proposed development is broadly compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2036 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2036 Policies CR1 and CR2 subject to the inclusion of a condition.

Urban Greening

335. Local Plan Policies DM10.2 (Design of green roofs and walls) and DM19.2 (Biodiversity and Urban Greening) encourage the inclusion of green roofs and walls. Planting would provide a green and attractive setting and the roof terraces offers important amenity spaces for occupiers of the building. The proposed greening accords with Local Plan policies DM10.2, DM10.3 and DM19.2.
336. Intensive green roofs (601sq.m) are proposed across Levels 3, 14, 16 and 19 and an extensive green roof (138sq.m) is proposed on Level 3 on the eastern elevation. Level 19 would include PV panels enabling a biosolar green roof. The green roofs and planting proposed including trees would enhance biodiversity and encourage the use of outdoor roof terraces spaces for the occupiers of the buildings improving well-being. The two accessible private roof terraces on Levels 3 and 20 would provide valuable further amenity spaces for the occupiers of the building. A blue roof featuring permeable paving on the accessible roof terraces is proposed to reduce rainwater run-off.
337. An Urban Greening Factor (UGF) calculation has been submitted with the application based on both the London Plan and City Plan metrics. The UGF for this application has been calculated as 0.39 (London Plan) and 0.43 (City Plan) based on the information provided.
338. The proposed development does not exceed the 0.4 minimum target score recommended in the London Plan. Officers consider, in this instance, that the applicant has maximised urban greening opportunities across the site and green roofs have been provided where possible. Given the sensitive nature of providing residential accommodation there is no scope for green walls. The applicant has committed through 278 works to provide a new pocket part area on Rangoon Street and wider tree planting both on adjacent streets and within in the local area through off site contributions.
339. Details of the quality, species, irrigation and maintenance of the proposed urban greening are required by condition.
340. As such, officers are satisfied that urban greening has been maximised on site and that due to offsite contributions and 278 works, in this instance, a deficiency in 0.01 under the minimum 0.4 target is acceptable.

Sustainability Conclusion

341. 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.

342. The proposed development is on track to achieve an “outstanding” BREEAM assessment rating. The upfront embodied carbon emissions can be reduced beyond the GLA’s Standard Benchmark. Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible, residential 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 the new Part L 2021 and London Plan requirements.

Trees

343. Local Plan Policy DM19.2 requires development to promote biodiversity and contribute to urban greening. Draft Local Plan Policy OS4 seeks to increase the number of trees within the City and resist the removal of trees, securing replacement trees of equivalent value. Policy G7 of the London Plan also requires, where possible, existing trees to be retained and adequate replacement of any trees to be removed.

344. There are nine trees located within the open space of the existing sunken courtyard and four located on Northumberland Alley (13 in total). The proposed development, as set out in Arboricultural Impact Assessment, seeks to remove these trees and provide replacement planting through 6 trees, 3 within the courtyard and 3 proposed on the public highway located on Crutched Friars. There would also be additional greenery located along the perimeter of the site through planters. A further 23 small shrubs/trees would be located on the roof terraces and within the public realm.

345. Of the existing trees which are to be removed 5 fall within category ‘B’ and 8 fall within category ‘C’. None of the trees to be removed have TPO status and are not located within a Conservation Area. It is considered that there may be opportunities for the timber to be reused in the scheme. Whilst it may not be so durable for use outdoors, as part of the landscaping scheme i.e. seating, there may be opportunities to use the timber internally for furniture or artwork and this could be procured in association with a London timber specialist. A condition is therefore recommended requiring approval for the methodology for removing the trees and the evaluation process for assessing how the timber may be reused. The current trees are all located on land under the ownership of the applicant and are mostly located within the sunken courtyard and not particularly accessible to the public. However, officers consider that the trees do currently contribute to street greening and amenity of the area along Northumberland Alley.

346. The proposed development would provide 3 new trees located within a newly created public courtyard outside of the museum, with seating incorporated. The applicant has proposed to plant three street trees within the public highway on Crutched Friars. The applicant has also committed to a contribution equal to the remaining 8 trees, which are to be lost and not






directly provided on the site, to the Aldgate BID who currently have a program of street level tree planting within the Aldgate area around the site.

347. A scheme of 278 works are also proposed to provide a new pocket park within the space of Rangoon Street which would likely benefit from additional tree planting within a publicly accessible area of the site.
348. At this time no robust feasibility work has been undertaken to demonstrate that the proposed 3 street trees on Crutched Friars would be deliverable. Therefore, the applicant has committed to increasing their obligation to the Aldgate BID equal to the 3 additional trees, on top of the initial contribution equal to 8, in the event they are unable to plant street trees on Crutched Friars.
349. It is also noted that an overall biodiversity net-gain of 191% would likely be achieved across the site.
350. Officers therefore consider that the proposed removal of the category B & C trees would be acceptable and adequate tree planting would be provided across the site and off-site contributions secure to tree planting in the local area to mitigate the harm of removing the existing trees. As such, the scheme is considered acceptable in regard to Policy G7 of the London Plan, Policy DM19.2 of the Local Plan and Draft Local Plan Policy OS4.

Environmental Impacts

Wind

351. London Plan Policy D8, Local Plan Policy DM10.1 and Draft City Plan Policy S8 require developments to optimise micro-climatic conditions and not to result in unacceptable wind impacts.
352. Computational Fluid 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.
353. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways, bus stops and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, consisting of five Comfort Categories defining conditions suitable for: frequent sitting /occasional sitting /standing /walking /uncomfortable.
354. Table 4 outlines the various criteria for wind microclimate assessment. Assessments have been carried out for both the Windiest Season and the Summer Season and with surrounding buildings within a 400m radius of the site.
355. Table 4: City of London criteria included in assessment (and taken from the City's Microclimate Guidelines, 2019).

Key	Comfort Category	Threshold	Description
	Frequent Sitting	<2.5 m/s	Acceptable for frequent outdoor sitting use, e.g. restaurant, café.
	Occasional Sitting	2.5-4 m/s	Acceptable for occasional outdoor seating, e.g. general public outdoor spaces, balconies and terraces intended for occasional use, etc.
	Standing	4-6 m/s	Acceptable for entrances, bus stops, covered walkways or passageways beneath buildings.
	Walking	6-8 m/s	Acceptable for external pavements, walkways.
	Uncomfortable/unsafe	>8 m/s	Not comfortable for regular pedestrian access.

356. This application is supported by both CFD modelling undertaken by GIA and Wind Tunnel Testing which has been separately undertaken by Arcaero. The reports are considered to follow an appropriate methodology and are in line with the City of London's Microclimate Guidelines.

357. The following sensitive receptors have been identified:

- Aldgate Square
- St Botolphs Church
- Leadenhall Street Bus Stop
- Aldgate bus station
- Northumberland Alley Courtyard
- 80 Fenchurch Street
- Rangoon Street Pocket Park
- 65 Crutched Friars Level 3 Terrace
- 65 Crutched Friars Level 20 Terrace
- Boundary House

358. The following scenarios have been tested:

- Baseline: The existing building on site, with the existing surrounds (including any planning consented schemes which are under construction at the time of writing);
- Proposed Development, Existing Surrounds: The completed and operational development with the existing surrounds; and
- Proposed Development, Cumulative Surrounds: The completed and operational development with the existing surrounds, plus local future schemes (either consented or awaiting determination).

359. Trees and soft landscaping have not been included in the model, to ensure that conditions represent a reasonable worst-case scenario.

360. The baseline results show that There are no safety or distress exceedances anywhere within the site or surrounding area, with winter conditions range between frequent sitting, occasional sitting, standing and walking and summer conditions range between frequent sitting, occasional sitting and standing. There are no safety exceedances on any roadways, and all change in conditions are gradual, so conditions are expected to be suitable for cycling. All off-site entrances within the study area will be suitable for either sitting or standing in all seasons, which will be suitable

for the intended use and all sensitive receptors are suitable for intended uses.

361. The proposal with existing development results in a slight increase in standing conditions along Crutched Friars and along Carlisle Avenue. There would be a slight improvement to existing conditions along Northumberland Alley adjacent to the proposed courtyard space which will benefit occasional sitting conditions. There are also improvements shown along Jewellery Street and Vine Street to occasional sitting conditions. The roof terraces at 80 Fenchurch Street would not see a material diminishment in wind conditions currently experienced and the terraces proposed as part of the application scheme would mostly benefit occasional sitting conditions, with a small area of standing. There are no safety exceedances on any roadways, and all change in conditions are gradual, so conditions are expected to be suitable for cycling. All off-site entrances within the study area will be suitable for either sitting or standing in all seasons, which will be suitable for the intended use and all sensitive receptors are suitable for intended uses.
362. The proposal with cumulative scenario is broadly the same as the results for proposed with existing conditions, with increases from occasional sitting to standing in streets around the site which is considered acceptable given their intended uses. Terraces at 80 Fenchurch Street would see an improvement to conditions in this scenario and the terrace proposed at Boundary House would have acceptable conditions. The proposed development amenity spaces would see acceptable conditions suitable to their intended uses.
363. It is considered that the proposed development in all scenarios tested would not result in any wind safety exceedances either at street level or on any amenity terraces within the surveyed radius. All spaces and identified sensitive receptors would remain suitable for their intended uses. There are no safety exceedances on any roadways, and all change in conditions are gradual, so conditions are expected to be suitable for cycling. All off-site entrances within the study area will be suitable for either sitting or standing in all seasons. Both CFD and wind tunnel testing were undertaken to make these assessments and are considered to be in line with the City of London's guidance.
364. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Assessment, to identify if the completed development has any material adverse effects not identified in the submitted CFD Wind Assessment prepared by GIA (dated 20 August 2021), and if any material adverse impacts are realised, mitigation measures would need to be explored and implemented.
365. Therefore, subject to mitigation measures, the development is considered to comply with London Plan Policy D8, Local Plan Policy DM10.1, and Draft City Plan 2036 Policy S8.

Thermal Comfort

366. London Plan Policy D8 and D9 and Draft City Plan Policy S8 states that development proposals should ensure that microclimatic considerations should be taken into account in order to encourage people to spend time in a place and that the environmental impacts - 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 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.
367. The Thermal Comfort Guidelines for Developments in the City of London (2020) sets out how the thermal comfort assessment should be carried out. 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.
368. The Universal Thermal Climate Index (UTCI) metric will be utilised for predicting thermal comfort as per the Thermal Comfort Guidelines. The usage categories for thermal comfort are set out below and is used to define the categorisation of a given location.

Usage Category	% of hours with Acceptable UTCI	Description	Colour (HTML Colour Code)
All Season	≥90% in each season	Appropriate for use year-round (e.g. parks).	Green (#378c4b)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).	Purple (#c86ebe)
Short-term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.	Cyan (#1effff)
Short-term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.	Orange (#fab92d)
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).	Red (#de2d26)

369. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. The proposals introduce sensitive receptors including new entrances at ground, public realm works and roof terraces.

370. Sensitive receptors within a 400m radius of the existing site have been considered in the assessment. At ground level, all entrances have been considered and would require short-term thermal comfort conditions or better to be considered acceptable for their intended use.

371. The following sensitive receptors have been identified:

- Leadenhall Street Bus Stop
- Aldgate bus station
- Northumberland Alley Courtyard
- 80 Fenchurch Street
- Rangoon Street Pocket Park
- 65 Crutched Friars Level 3 Terrace
- 65 Crutched Friars Level 20 Terrace
- Boundary House

372. The following scenarios were tested:

- Baseline: The existing building on site, with the existing surrounds (including any planning consented schemes which are under construction at the time of writing)
- Proposed Development, Existing Surrounds: The completed and operational development with the existing surrounds; and
- Proposed Development, Cumulative Surrounds: The completed and operational development with the existing surrounds, plus local future schemes (either consented or awaiting determination).

373. In the proposed and cumulative scenarios, all ground level conditions are suitable for the intended use, and no adverse impacts due to thermal comfort are expected. The scheme results in an increase of seasonal conditions and the introduction of short-term conditions as a result of the development, however, these do not result in any conditions not being suitable for the intended use of the ground level spaces. This applies to all roadways, bus-stops, thoroughfares, building entrances (both existing and proposed), and existing and proposed amenity spaces.

374. Conditions for the existing roof terraces located at 80 Fenchurch Street are consistent with the baseline and would not be materially impacted by the proposed development. Conditions for the proposed roof terraces associated with the student accommodation are considered suitable for their intended use.

375. Cumulative effects are consistent with the effects with existing surrounds scenario, and conditions for the roof terrace on the cumulative Boundary House development (21/00826/FULMAJ) will be suitable for the intended use.

376. The development is considered to comply with London Plan Policies D8 and D9 and Draft City Plan 2036 Policy S8 and would not result in unacceptable thermal comfort conditions both within the development proposal or to surrounding ground level streets and spaces or amenity terraces.

Daylight/Sunlight & Overshadowing

377. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.
378. Local Plan Policy DM10.7 'Daylight and Sunlight' 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 Building Research Establishment (BRE) guidelines.
379. Draft City Plan Policy DE8 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards.
380. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the Draft City Plan states when considering proposed changes to existing lighting levels, the Corporation will take into account the cumulative effect of development proposals.
381. The application site is not immediately adjacent to any identified residential areas but sits opposite Roman Wall House, which is in use as student accommodation for Urbanest, and nearby other isolated instances of permanent C3 residential properties, with the Mansell Street Estate slightly further afield. Local Plan Policy DM 21.3 'Residential Environment' seeks to protect the amenity of existing residents within identified residential areas by ensuring that all development proposals are designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

Assessment Context – BRE Guidelines

382. The BRE guidelines "Site layout planning for daylight and sunlight - A guide to good practice" (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels) (a full explanation of the methodologies is provided in Appendix C):
- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide recommends compliance with both the VSC and daylight distribution (NSL) guidelines.

- **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchens and bedrooms to be less important, but that care should be taken to not block too much sun from these rooms.

Interpreting results

383. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is *proportionately* a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

Overshadowing

384. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

Assessment

385. A daylight, sunlight and overshadowing report with regards neighbouring properties and open spaces has been submitted with the application, which has been undertaken using the recommended BRE daylight (VSC, NSL), sunlight (APSH) and overshadowing (SHOG) assessment methodologies. An 'internal' daylight and sunlight report with regards the proposed student accommodation has also been submitted. The reports were originally produced prior to the 2022 BRE Guidelines being published, where the primary change was to the assessment method for internal levels of light (to the proposed student accommodation) from Average Daylight Factor (ADF, shown visually in radiance diagrams), to illuminance and Median Daylight Factor. The neighbouring impacts report retains use of the ADF method for consistency, given this is what was used to assess both the Boundary House application and the Roman Wall House application itself. The report for the internal light levels to the development site has included the new illuminance/MDF methodologies as well as a supplementary assessment of the ADF methodology results, given the timing of the production of the report with the release of the new BRE guidelines.

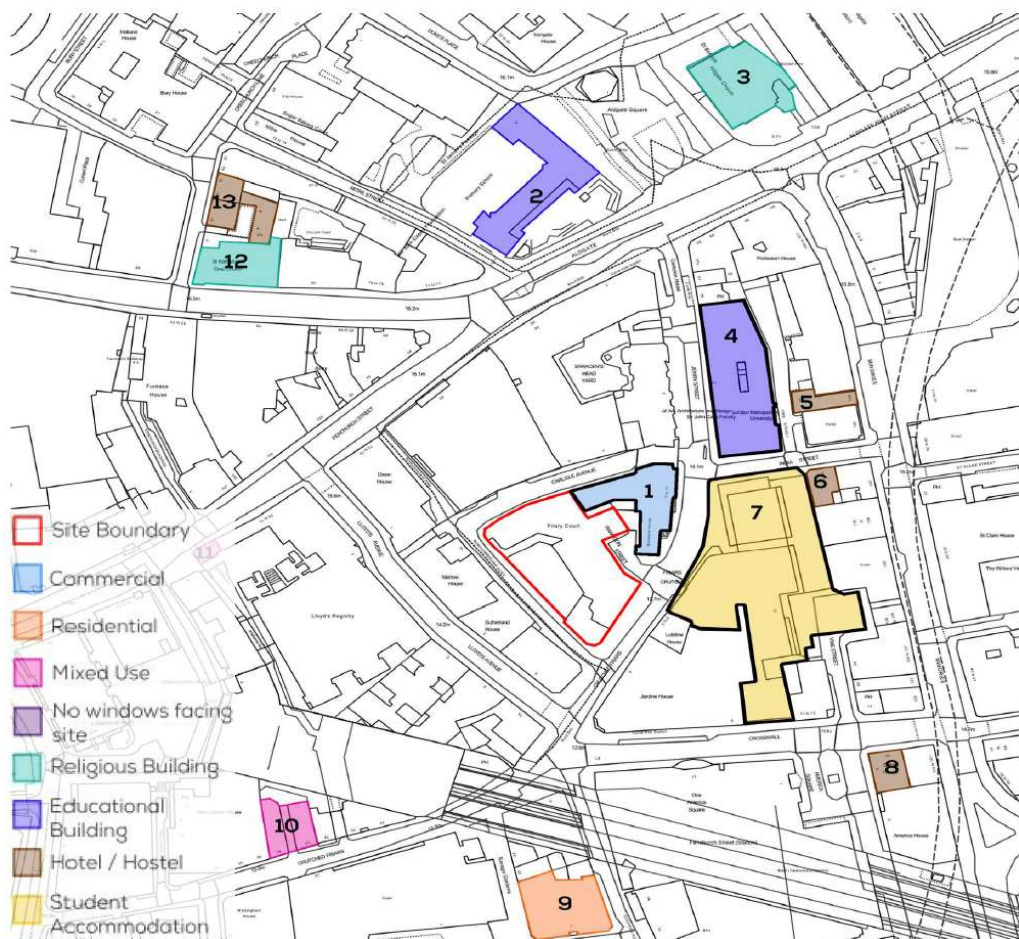
386. The report on the neighbouring impacts has provided two main assessment scenarios:

- Baseline scenario: existing vs. the proposed scheme;

- Cumulative scenario: existing vs. the proposed scheme and the resolution to grant (RTG) Boundary House redevelopment scheme (21/00826/FULMAJ);

387. The following properties and amenity areas were originally requested by officers to be included within the neighbouring impacts assessment:

- Roman Wall House (Urbanest)
- David Game College (31-35 Jewry Street)
- Boundary House (RTG scheme)
- The Aldgate School
- St Botolph Without Aldgate
- 60 Vine Street
- 8 India Street
- 3 America Square
- 1 Pepys Street
- 39-41 Crutched Friars
- 67 Fenchurch Street
- St Katharine Cree
- 10-16 Creechurch Lane



388. A number of the originally requested properties were removed from the assessment following further analysis and recommendations by the BRE guidelines that if the distance of the new development from a neighbouring

property is more than three times its height above the lowest window of the neighbour, then daylight is unlikely to be affected. This method discounts: 60 Vine Street, 8 India Street, 3 America Square, 1 Pepys Street, 39-41 Crutched Friars, 67 Fenchurch Street, and 10-16 Creechurch Lane.

389. Further, the BRE guidance states that if the whole of the development sits within a 25-degree angle, drawn from the lowest window on the neighbouring property, then the proposed development is unlikely to have a substantial effect on the diffuse skylight enjoyed by existing neighbouring buildings. St Botolph Without Aldgate Church and St Katharine Cree Church sit comfortably below the profile of the 25-degree angles, and thus can be discounted from further assessment.
390. The Aldgate School would marginally protrude the 25-degree angle; however, the proposed development would be hidden behind 80 Fenchurch Street which, with 80 Fenchurch Street removed from the scope of visibility, Aldgate School would sit within the 25-degree angle, meaning it is reasonable to assume that the proposed development would not have an adverse impact to the daylight sunlight levels enjoyed by the Aldgate School, thus also removing it from further assessment.
391. This process of elimination, following the BRE guidelines, leaves three neighbouring properties still requiring assessment: Boundary House (RTG Hotel scheme), David Game College (education), and Urbanest/Roman Wall House (student accommodation).
392. As above, a supplementary radiance-based assessment of the internal daylight levels within the student rooms at Roman Wall House has also been submitted, which takes account of internal and externally reflected daylight in the existing and proposed scenarios (a full explanation of the radiance assessment methodology is provided in Appendix C). Roman Wall House has been chosen as the only subject of the radiance assessment as it is the property that would experience the greatest level of impact to the daylight and sunlight it receives as a result of the proposed development.

Daylight and Sunlight – neighbouring impacts

David Game College

393. David Game College is an independent school and sixth form based in the Grade II Listed 31 Jewry Street. This building also contains the offices of The Portal Trust (former Sir John Cass Foundation). It is maximum 5-storey in height building dating to 1899. As it is in educational use, the BRE guidelines (section 2.2.2) state that its occupants have a reasonable expectation of daylight.
394. 134 windows serving 60 rooms have been assessed. In the existing vs. proposed (baseline) scenario, using both VSC and NSL methodologies for daylight analysis, all 134 windows and 60 rooms demonstrate 100% compliance with the BRE guidelines.

395. With regards sunlight in the baseline scenario, 113 windows serving 60 rooms within 90-degrees due south of the proposed development site were assessed against the Annual Probable Sunlight Hours (APSH), and 56/60 rooms (93.3%) demonstrate BRE compliance. Of the 4no. rooms that fall short, the impacts are minor and are disproportionately caused by a loss of winter sunlight. One room in the basement has 29% APSH and 2% WPSH which would be reduced to 23% and 1% respectively; a room on the first floor has 28% APSH and 1% WPSH as existing which would be reduced to 22% and 0% respectively; another on the first floor has 32% APSH and 4% WPSH which would be reduced to 27% APSH and 3% WPSH respectively; and finally one room on the fourth floor has 33% APSH and 8% WPSH as existing that would be reduced to 28% and 4% respectively.
396. Guidance states that a window/room would technically fall below the guidance for sunlight if (a) the room receives less than 25% APSH and experiences more than a 20% change to annual sun, or less than 5% WPSH and more than a 20% change to winter sun; and the same room has a reduction in APSH of 4% or more. Both criteria need to be met for the window/room to fail.
397. As evidenced above, these four rooms of David Game College have relatively low levels of existing sun light, and as a result the change from 2% WPSH to 1% WPSH, for example, is disproportionately high. In reality, this change is unlikely to be overly perceptible to the human eye. In the case of the basement and two first floor rooms, in the cumulative scenario with Boundary House built between David Game College and the development site, all three rooms would instead pass and the impact from Friary Court falls away, leaving only the room on the fourth floor being impacted by Friary Court alone. It is also believed that this fourth floor room is not a habitable/usable room and is instead plant/machinery, so could theoretically be discounted.
398. In the cumulative scenario (including RTG Boundary House), with regards daylight (VSC), 84 of the 134 windows (62.7%) meet the BRE criteria. Of the 50 windows that do not meet the criteria, 30 windows would experience a minor impact with regards VSC (between 20% and 30% loss), 7 would experience a moderate impact (between 30% and 40% loss) and 13 windows would see major reductions in VSC beyond 40%. These losses, as evidenced by the results in the baseline scenario, are entirely caused by the Boundary House redevelopment scheme, given the proximity of Boundary House to David Game College.
399. With regards NSL in the cumulative scenario, 44 out of the 60 rooms assessed meet the BRE criteria. Of the remaining rooms, 5no. would experience a minor NSL transgression of between 20% and 30% loss, 7no. would experience moderate transgressions of between 30% and 40% loss, and the remaining 4 would experience transgressions beyond 40%. Again, as above in the baseline scenario assessment, these losses are caused by the Boundary House redevelopment, not the proposed scheme.

400. With regards sunlight in the cumulative scenario, 39 out of the 113 windows assessed would meet BRE criteria for APSH; 74no. windows would fall short. This means that the additional 17 rooms that do not meet the criteria over and above the baseline scenario can be attributed to the Boundary House scheme. Of the total 74 windows that fail to meet the criteria, 6 would experience minor reductions, 22 moderate reductions, and the remaining 46 would see major reductions beyond 40%. The assessment of the winter probable sunlight hours is a similar story, with the transgressions being caused by Boundary House.
401. Overall, it is clear when comparing the baseline scenario results to the cumulative scenario results that the biggest impact to the daylight and sunlight of David Game College is caused by the Boundary House redevelopment, not the proposed scheme at Friary Court. The proposed scheme would not cause a material impact to the daylight or sunlight levels experienced by occupants of 31 Jewry Street, and the cumulative scenario is considered acceptable given that the slight further reduction in APSH above the Boundary House impacts (for the fourth floor affected room) would still see good retained levels of sunlight, with the main losses overall being to winter sun.

Boundary House (RTG)

402. The Boundary House resolution to grant redevelopment scheme is a circa 15-storey building primarily for hotel use. It should be noted that temporary accommodation uses such as hotels are, according to the BRE guidelines, less sensitive than permanent residential schemes for example, with regards daylight and sunlight. That being said, hotel users still have a reasonable expectation of good light levels, hence the inclusion of the RTG scheme within the analysis. 104 windows serving 93 hotel bedrooms have been assessed. There are no other cumulative schemes that would impact Boundary House, so the assessment has focused on the proposed Friary Court scheme against the RTG Boundary House scheme only.
403. Using VSC methodology for daylight, only 24/104 (23.1%) of windows would achieve the 27% VSC target; however, many of these windows/rooms would face the existing 80 Fenchurch Street development across a very narrow Carlisle Avenue, meaning their available sky is already reduced. In the proposed scenario, 25/104 (24%) of windows would receive VSC of above 27% or not see a change to VSC above 20%, meeting BRE criteria. 86no. windows would not meet the BRE criteria, with 16 being minor transgressions (20%-30% reductions), 9 being moderate (30%-40%) and 54 experiencing major transgressions of above 40%.
404. When using NSL methodology for daylight, 37 out of 93 rooms (39.8%) would meet BRE criteria. Of the 56 rooms that would be affected if built, 4 would see minor losses, and the remaining 52 would see major losses of above 40%. The report states that the impacts are a direct consequence of the spatial relationship between the two proposed schemes which is inevitable due to the small separation distances. This is agreed. It should also be noted that although the users of the hotel have a reasonable

expectation of daylight, it has not yet been consented or indeed built, and as such users would not notice the losses as much as users of a pre-existing building would. The losses would only be realised if and when both schemes are built.

405. With regards sunlight and APSH, the south facing bedrooms within the Boundary House scheme were assessed, totalling 70 windows. 19no. of these windows (27.1%) would meet the BRE criteria.
406. As above, the submitted report reasonably concludes that the much of the RTG hotel scheme would be unaffected by the proposed development, particularly those which face Crutched Friars which were not modelled in the assessment. The hotel bedrooms that were included in the assessment are in a compromised situation even without the proposed scheme, facing the 80 Fenchurch Street development with very small separation distances. As the hotel has not yet been built, and given its transient nature, users would not experience any material significant losses of light if both schemes are built, and given the reduced sensitivity of the use.

Urbanest/Roman Wall House

407. Roman Wall House, 35 Vine Street, is a new build circa 14-storey building opposite the proposed development that is in use as student residential, operated by Urbanest. Student residential accommodation is considered a more temporary, transient use than permanent C3 residential, but less so than a hotel such as Boundary House, with students staying for the majority of a year, albeit with much of their term time spent on their university campus'.
408. For the analysis, 426 windows serving 327 rooms were identified as relevant.
409. It should be noted that the existing context surrounding Roman Wall House is relatively low scale, with approximately 5 storeys to both the existing Friary Court and Boundary House buildings, and therefore the student rooms, when originally designed, assessed, and built, would naturally experience good daylight levels for the urban context.

Daylight – existing vs proposed

410. The VSC results demonstrate that 293 out of the 426 windows assessed (68.8%) would be BRE compliant. It should be noted that in the pre-existing scenario, without any redevelopment of the proposed site, only 140/426 windows on Roman Wall House (32.9%) would meet the target value of 27% or greater VSC.
411. Of the remaining 133 windows, 40 would experience minor adverse proportional reductions in VSC (between 20% and 30%), 50 would experience moderate adverse proportional reductions in VSC (between 30% and 40%) and 43 would see major adverse proportional reductions in VSC beyond 40% loss.

412. Despite the above results, most windows fronting Crutched Friars would continue to experience good retained levels, with the exception of the first floor of Roman Wall House which sits underneath an overhang and already has poor levels of VSC (<6%) as originally designed and built. This automatically makes any percentage reductions experienced as a result of the proposed Friary Court development disproportionate. Above the overhang, at second floor and above, retained levels of between 12.5% and 15.5% would be experienced, which is considered acceptable for transient accommodation in such a dense urban location. This figure increases, naturally, the higher up Roman Wall House, with 5th to 10th floors reaching just under the desired 27% retained VSC, at 26.9%. Retained VSC levels in the mid-teens are considered acceptable in city centre locations, and anything above 20% is considered good.
413. With regards daylight distribution (NSL), 241 out of the 327 (73.7%) rooms meet the BRE criteria. Of the 86 which fail, 17 would experience minor losses of between 20% and 30%, 22 moderate (30%-40%) and 47 would experience major losses of above 40%. The vast majority of the rooms assessed would be BRE compliant.
414. A radiance based ADF assessment has been produced for Roman Wall House to better demonstrate compliance with regards daylight as a result of the proposed development. It should be noted that the ADF test formed part of the 2011 BRE guidelines but was superseded in the 2022 update by illuminance and Median Daylight Factor. Nonetheless, it provides a useful visual analysis of the results to give an overall picture of the daylight quality within Roman Wall House and it is for the Local Planning Authority to use their discretion as to how and when the old versus new methods are applied. The use of the ADF method is considered acceptable in this scenario.
415. With the ADF method, different room types are given targets depending on their use. For example, a living/kitchen/diner should aim for 1.5%, whereas bedrooms were expected to achieve 1% ADF. There is no specific guidance around student accommodation, but it is accepted that the 1% ADF target for bedrooms can be used considering that is the primary function of the student rooms. This method was also used in the Boundary House scheme to assess the impact on Roman Wall House, and in the application for Roman Wall House itself.
416. The radiance analysis shows that 227 out of 327 rooms assessed meet the 1% ADF target in the existing conditions, and 222 out of 327 rooms meet the target in the proposed conditions (this is notwithstanding the aforementioned VSC and NSL transgressions), meaning that just 5 rooms would see daylight levels below the expected acceptable levels. It is most important to note that these 5 rooms are all located underneath Roman Wall House's own overhang, below first floor level, which disproportionately accentuates any transgressions.
417. In the cumulative scenario (with Boundary House), the number of compliant rooms (achieving 1% ADF) is reduced to 191 out of 327.

Daylight – cumulative

418. The cumulative assessment (proposed development plus RTG Boundary House) shows that an additional 76 windows (over and above the 133 windows that fail in the baseline scenario) would not meet the BRE criteria for VSC, reducing the percentage of compliant windows to 50.9%. The retained values in the cumulative scenario are proportionally lower than in the baseline scenario; for example, with the second floor (above Roman Wall House's own overhang), the retained levels drop from between 12.5% and 15.5% down to between 4% and 9%, the third floor dropping from 13.5% and 17.2% to 6.6% and 10%, and fifth to tenth floors dropping from just below the desired 27% VSC to 7.6% and 12.3% on the fifth floor, to above 20% on the tenth floor upwards.
419. With regards daylight distribution (NSL), in the cumulative scenario 40 rooms would experience a transgression, meaning 126/327 would not be BRE compliant, dropping the compliance rate down to 38.5% compared to 73.7% in the baseline scenario. Once again, it is clear that the majority of the impact stems from Boundary House and overall, the proposed development would achieve majority BRE compliance.

Sunlight

420. 169 rooms/windows orientated within 90° due south of the proposed development have been assessed for sunlight. When assessed against APSH and WPSH, all 169 rooms/windows would meet the BRE criteria in both the baseline and cumulative scenarios.
421. Overall, once again the majority of the impact to Roman Wall House can be attributed to the Boundary House development, with the proposed development at Friary Court contributing little to the transgressions. The standalone baseline scenario is considered acceptable, the Boundary House impacts were considered acceptable in the RTG scheme, the cumulative impact is not materially different to the Boundary House baseline, and the daylight and sunlight impacts to Roman Wall House would not be materially worsened should both schemes be built.

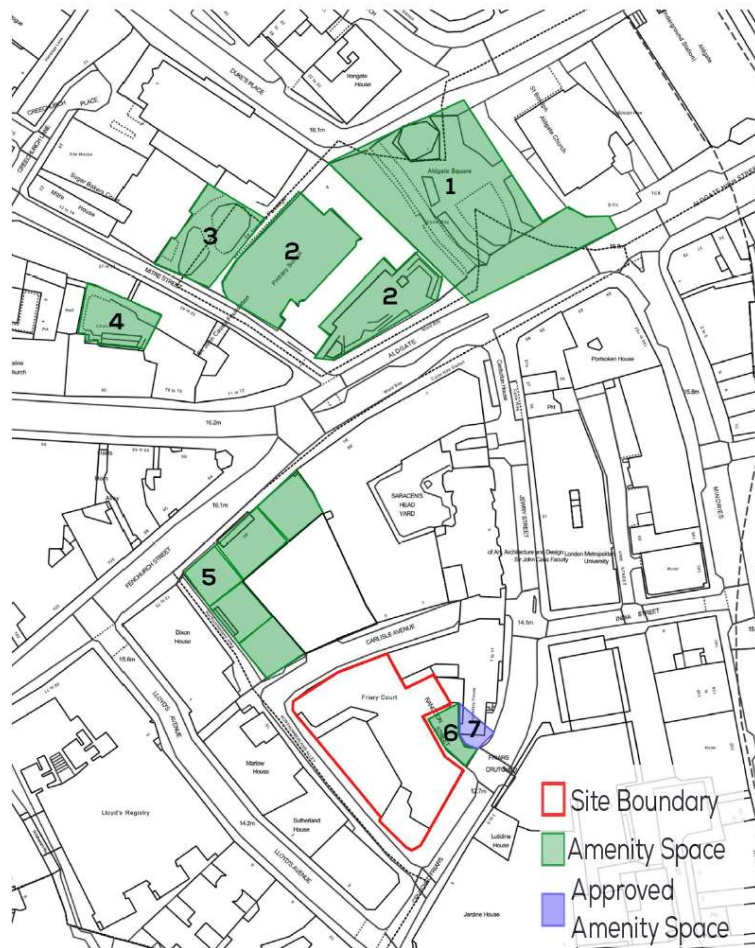
Surrounding commercial buildings

422. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. It is not considered that the proposed development would have an unacceptable

impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in these respects.

Overshadowing (Sun Hours on Ground)

423. The BRE guidelines state that for an amenity area to appear adequately sunlit throughout the year, at least half of the area should receive at least two hours of sunlight on 21 March (Spring Equinox). A total of 7 external amenity areas surrounding the Application Site have been assessed for overshadowing before and after the proposed development. As shown on the map below, these are: Aldgate Square, Aldgate School, Mitre Square Gardens, St Katharine Cree churchyard, 80 Fenchurch Street, Rangoon Street, and Boundary House terrace (future scenario). The internal daylight and sunlight assessment also includes analysis of the proposed public realm area on Northumberland Alley.



424. The overshadowing assessment demonstrates that the proposed development would not reduce the amount of direct sunlight received in all seven of the surrounding amenity areas that have been included in the assessment. Five of the seven areas would experience a 0% loss of sunlit proposed area, with the remaining two areas receiving very negligible losses of 0.46% (80 Fenchurch Street) and 1.37% (Boundary House terrace – future scenario) respectively. These reductions sit comfortably

within the 20% threshold set by the BRE Guidelines. As such, the assessment demonstrates that all amenity areas would experience fully BRE compliant alterations in the level of direct sunlight received after the proposed development is constructed.

425. In terms of the overshadowing impact to the proposed communal student amenity spaces, including both external terraces and internal amenity spaces, has been undertaken.
426. The upper communal terrace (level 20) would experience more than 6 hours of sun exposure per day as of the 21st March (spring equinox). The third-floor terrace, which the communal internal amenity space has direct access to, would receive around 3+ hours of sun exposure per day as of the 21st March, with this number expected to increase into the summer months. It is considered that the outdoor communal terraces would receive very good sun exposure throughout the year.
427. With regards the internal amenity space at levels 2 and 3, as detailed floor plans are not yet known, the results show a worst-case scenario. The second-floor level (towards the corner of Northumberland Alley and Carlisle Avenue) would experience between 0 and 27 minutes of sunlighting at the spring equinox, with the third floor faring better, ranging between 45 minutes and 90+ minutes. As above, this space also has direct access to the well-lit outdoor terrace at third floor level. The applicant states that the light levels indicated will help dictate the layout and function of the interior spaces, so it is intended that the more well-lit areas will be used as study spaces, and the less well-lit areas as back of house or circulation.
428. Daylight distribution diagrams have been provided that further explain the light levels to the internal amenity spaces. The results provide a visual indication of the percentage of annual daylight hours that 150lux (illuminance) is achieved across the rooms:



Figure 3: Ground Floor Student Amenity Space Daylight Performance



Figure 4: Second Floor Student Amenity Space Daylight Performance



429. With regards the proposed public realm on Northumberland Alley, because of its location at street level and shading caused by the surrounding context, the area would not meet the BRE criteria for sun hours on ground. However, the level of shading is similar to the existing scenario to the private courtyard within Friary Court. On the 21st March, the area would experience pockets of direct sunlight for 1-1.5 hours, and in the summer this increases to 1.5-3hrs of direct sunlight on the summer solstice.

Daylight and Sunlight – internal impacts

430. In terms of future student amenity, the proposed building and its fenestration has been designed to overcome both internal light levels and overheating issues, with the design of windows varying across the building to allow larger windows lower down and smaller windows higher up.

431. An Internal Daylight and Sunlight assessment has been provided, based on the new 2022 BRE Guidelines, which utilises daylight illuminance, or spatial daylight autonomy (sDA), with regards daylight to the proposed student rooms, and the usual sun exposure on the 21 March test for sunlight. A supplementary assessment using the old BRE 2011 methodology of the Average Daylight Factor (ADF) was also produced. Although there was/is no set ADF target for student bedrooms, as above it is reasonably assumed that 1% be used, as opposed to the old 1.5% target for living/kitchen/dining rooms.

432. Based on the 2011 ADF methodology and the existing versus proposed scenario, 80% of the proposed student bedrooms would meet the target of 1%, with a further 44 rooms marginally below the target level. In the cumulative scenario with Boundary House, 60% of the proposed student bedrooms would meet the target of 1% with 59 rooms marginally below the target.
433. Under the 2022 BRE guidelines and the new illuminance test, the target for student accommodation is recommended as 150lux for half the annual daylight hours of the room for half of the room area, but Local Planning Authorities can use their discretion.
434. In the baseline scenario, 366no. (47%) of the 780 student rooms would meet the target illuminance of 150lux or higher for half the annual daylight hours within half the room area. In the cumulative scenario with Boundary House, this is reduced to 326 (42%) meeting the target illuminance of 150lux.
435. Of the rooms that fall short of the target, 203 (25%) meet the lower target illuminance of 100lux for bedrooms in the baseline scenario, and 160 (21%) meet the lower target illuminance in the cumulative scenario. Therefore, 73% of rooms meet the BRE recommendations for bedrooms in the baseline scenario and 62% in the cumulative scenario.
436. Of the 211 rooms in the baseline scenario that fall below the target illuminance, the following can explain the transgressions:
437. 16no. rooms are on the lowest two floors of accommodation, facing either the courtyard or south over Crutched Friars; 7no. and 3no. of these (courtyard vs Crutched Friars) fall only marginally below the recommended 50% level, reaching 45% or more of their area seeing 100lux for half the daylight hours, with the remaining 6no. receiving 100lux for half the daylight hours within the front third of the room, where it is likely the desk would be placed.
438. 4no. rooms are dual aspect accessible bedrooms with their easterly windows obstructed by the existing Boundary House. They would achieve 100lux for half the daylight hours within the front 40% of the room.
439. 48no. rooms are located on the east elevation. 40no. are on lower floors where their daylight availability is naturally restricted by the dense urban context, primarily the existing Boundary House. 8no. are at levels 11-14 where their windows start to become smaller than below to offset overheating concerns. 24no. out of the 48no. rooms would meet 100lux for half the daylight hours within the front third of the room.
440. 143no. rooms are located on the north elevation, restricted by the development at 80 Fenchurch Street across a very narrow separation distance. 23no. of these rooms would meet 100lux for half of the daylight hours within the front third of the room. Officers are concerned with the daylight availability to the remaining 120no. rooms but accept that such transgressions are inevitable within a dense urban environment, as well as

the compromise to be had between the window size, and therefore increased or decreased daylight availability, versus overheating concerns.

441. It should also be noted that within the additional assessment undertaken using the 2011 BRE Average Daylight Factor methodology, which was used to assess the student accommodation at Roman Wall House, 621no, or 80% of the bedrooms would meet the ADF target of 1.0.

442. Of the 54 shared kitchen/living rooms, 56% would meet or exceed the recommendation of 200lux within half their area for half the available daylight hours, but in using the 150lux criteria for living rooms, this figure is increased to 85%. As below, all 54 rooms meet the sun exposure criteria.

443. Of the 294 rooms in the cumulative scenario that fall below the target illuminance, the following can explain the transgressions:

- 17no. rooms are located on the lowest 2 floors of accommodation, facing either the courtyard or south onto Crutched Friars. 8no. on the lowest floor facing the courtyard and 3no. facing Crutched Friars fall only marginally below the 50% target, at 45% or more of their area receiving 100lux for half the daylight hours. The remaining 6no. receive 100lux for half the daylight hours in the front third of the room, where the desk would likely be placed.
- 4no. are dual aspect accessible bedrooms with their easterly windows obstructed by the proposed RTG Boundary House. They would achieve 100lux for half the daylight hours within the front third of the room, as opposed to front 40% of the room in the baseline scenario.
- 273no. rooms are located on the north and east elevations, restricted by the existing 80 Fenchurch Street and RTG Boundary House. 42no. of these rooms would receive 100lux for half of the daylight hours in the front third of the room, where desks would be placed. Officers are concerned with the remaining 231 rooms' daylight availability but accept the inevitable transgressions in such a location, as well as the compromise to be had between the window size, and therefore increased or decreased daylight availability, versus overheating concerns.
- It should also be noted that within the additional assessment undertaken using the 2011 BRE Average Daylight Factor methodology, which was used to assess the student accommodation at Roman Wall House, 514no, or 66% of the bedrooms would meet the ADF target of 1.0.
- Of the 54 shared kitchen/living rooms, 54% would meet or exceed the recommendation of 200lux within half their area for half the available daylight hours, but in using the 150lux criteria for living rooms, this figure is increased to 65%. As below, all 54 rooms meet the sun exposure criteria.

444. With regards sunlight, in the baseline scenario, 52% (407/780) of the rooms meet or exceed the BRE recommendations for sun exposure on the 21st March of 1.5hrs, and all 54 shared kitchen/living rooms meet the

criteria. In the cumulative scenario, 51% of bedrooms (394/780) meet or exceed the criteria, and all 54 communal rooms meet the criteria. In both the baseline and cumulative scenarios, of the 363 rooms with an aspect within 90-degrees of due south, 95% of these meet the criteria, with just 15 rooms falling below.

445. Of the 373 bedrooms that fall below 1.5hrs in the existing scenario, 30 fail only marginally, with 1.25hours or more achieved.
446. 117no. are north-east facing, and 29 are north-west facing. As such, they do not have a reasonable expectation of sunlight. The remaining 188 rooms are almost due north, facing Carlisle Avenue, so can also be said not to have a reasonable expectation of sunlight.
447. Of the 386 rooms falling below 1.5hrs in the cumulative scenario, 28 would fail marginally, with 1.25hours or more achieved. 128no. rooms are north-east facing, 29no. are north-west facing, and 192 are almost due north facing Carlisle Avenue. These rooms do not have a reasonable expectation of sunlight given their orientation.
448. In both scenarios, 9no. rooms facing Crutched Friars on floors 3-4 are obstructed by taller buildings to the south of the site, but would still receive in excess of 30 minutes of sunlight at the spring equinox, this number increasing over the summer months.
449. In both scenarios, the 363 rooms with an aspect within 90-degrees of due south, only 15 rooms fall below the recommended level due to the taller buildings immediately opposite the site.
450. Policy H15(A)(5) of the London Plan requires that student accommodation provides adequate functional living space and layout, and paragraph 4.15.6 of the London Plan sets out that the design of the development must be high quality and in accordance with the requirements of London Plan Policy D3 (optimising site capacity through the design-led approach).
451. Local Plan Policy DM21.1 (Location of New Housing) states new housing (including student accommodation) will only be permitted where development would not result in poor residential amenity within existing and proposed development. Local Plan Policy DM21.5 (Housing Quality Standards) requires all new housing to be designed to a standard that facilitates the health and well-being of occupants including taking into account provision of acceptable daylight to dwellings commensurate with a city centre location.
452. The development has been optimised to reduce the number of north-facing rooms but because of the dense urban location, it is expected that not all rooms would meet the criteria set out by the BRE guidelines. Officers are concerned about the results achieved by a number of rooms, particularly those on the north and east elevations (fronting 80 Fenchurch Street as existing and Boundary House in the cumulative scenario), but it is reasonable to expect the rooms to fall below guidance in the dense city centre location, particularly where there are very narrow separation distances over Carlisle Avenue and the adjacency of the site to the east.

Officers consider that the building design has been optimised, particularly with regards the fenestration, to allow for the most reasonable light levels to the rooms whilst also successfully overcoming concerns around overheating in this tall building. The compromise between daylight levels and overheating is finely balanced and Officers consider that the applicant has successfully achieved the right balance in this difficult context. Further, it is considered that the access to well-lit communal spaces including indoor amenity and outdoor terrace spaces (plus two street level pocket parks) would satisfactorily offset the lower-than-expected levels of daylight and sunlight in some rooms, with the prospective students receiving an acceptable level of amenity from these spaces and their rooms combined. It should also be considered that the room layouts are recommended to be optimised with desks in front of the windows to enhance the light levels available for study (secured by condition), and that the students would spend a good portion of their time away at their university campus.

Daylight, Sunlight and Overshadowing Conclusion

453. The neighbouring daylight, sunlight and overshadowing report has assessed the daylight and sunlight impact to three surrounding properties, with a number of other properties ruled out following initial assessment and guidance from the BRE, as well as the direct sunlight impact to 7 surrounding external amenity spaces.
454. The detailed technical assessments demonstrate that David Game College (educational use) would only experience minor transgressions as a result of the development, in particular to winter sun, but would experience good retained levels with the main impacts stemming from Boundary House.
455. There would be a number of technical breaches of the BRE guidelines with regards Roman Wall House, some of them being moderate and major adverse, but again these can be attributed mostly to the Boundary House redevelopment, and the transgressions in the baseline scenario are not materially different than the Boundary House scheme. The impacts to Roman Wall House are considered acceptable in both baseline and cumulative, and in that student accommodation is a more transient use with a reduced expectation of good light levels as per the BRE guidelines than if there were neighbouring permanent residential uses.
456. There would be a number of moderate and major technical breaches of the BRE guidelines with regards the redevelopment scheme at Boundary House, but the proposed hotel is less sensitive given its transient nature. It is also to be expected with the dense urban location with very narrow separation distances, and there would be a reciprocal impact between the two buildings.
457. Officers express some concern around the light levels to some of the student rooms and amenity spaces within the proposed development. The majority of the moderate and major transgressions/impacts are to rooms on the lower floor levels in particular on the north and east elevations,

fronting 80 Fenchurch Street and Boundary House. Whilst concern remains, Officers consider that the site has been well optimised for its location, has struck the fine balance between daylight distribution and overheating with the variation in window design, and overall consider that the students would experience good levels of amenity with access to internal and external communal spaces that are well lit. It is also recommended that the layout of the rooms be optimised and secured by condition to ensure that desks are located in the brightest part of the rooms.

458. The surrounding seven external amenity areas assessed would experience fully BRE compliant alterations in direct sunlight on 21 March with five of the areas experiencing no loss at all.
459. Overall, the daylight and sunlight impact of the proposed development on neighbouring properties and external amenity areas is considered to be acceptable and in accordance with the requirements of Local Plan Policies DM10.7, DM21.3 and DM21.5, London Plan Policies D3, D6 and H15(A)(5) and Draft City Plan Policy DE8.

Solar Glare and Light Pollution

460. The BRE Guidelines recommend that solar glare analysis be carried out to assess the impact of glazed facades on road users in the vicinity. Policy DM10.1 of the Local Plan and policies S8 and DE8 of the draft City Plan seek to ensure that developments address and do not have any intrusive solar glare impacts on the surrounding townscape and public realm.
461. The applicant has provided a solar glare assessment within the submission, produced by GIA Surveyors. The report concludes that the design of the facades is unlikely to give rise to a significant solar glare effect to surrounding road users (eastbound traffic on Crutched Friars - junction with Lloyd's Avenue/Crosswall/Coopers Road; or northbound traffic on Savage Gardens – junction with Pepys Street). Officers agree with this statement. The design of the building incorporates solid façade elements that break up the intensity of the glazing, and the materiality for the solid elements would have relatively low reflectivity. Officers consider that there would not be a high potential for solar glare as a result of the development.
462. Notwithstanding, should planning permission be granted, a clause would be included within the S.106 agreement that would require a post completion solar glare assessment to be submitted if requested by the City. This would include details of any mitigation measures if considered necessary. In the light of the proposed design and materiality of the development and the S.106 clause it is not considered that the development would result in any undue solar glare issues and would therefore accord with policy DM10.1 of the Local Plan and policies S8 and DE8 of the draft City Plan subject to the S106 obligation and conditions around bay details and materials.

463. 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.
464. Light pollution can be defined as any light emitting from the proposed development onto a neighbour's property where it is unwanted. The principal guidance for light pollution is set out within the Institution of Lighting Professionals (ILP) Professional Lighting Guide PLG 04 – Guidance on Undertaking Environmental Lighting Impact Assessments 2013. The ILP guidance sets out that the maximum level of light intrusion that should be experienced by a neighbouring property in a city centre with high levels of night-time activity is 25-lux pre-curfew, and 5-lux post-curfew (after 11pm).
465. New lighting is proposed in internal and external parts of the development. A condition is recommended requiring a lighting strategy for internal, external and semi external lighting, which would include details of levels and how the lighting has been designed together with management measures to reduce glare and light pollution.
466. Subject to the recommended condition, the proposed development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9.

Noise and Disturbance

467. London Plan Policy D13 requires the proposed development to mitigate noise-generating uses and Policy D14 aims to avoid significant adverse noise impacts on health and quality of life, and Local Plan Policies DM3.5 and DM15.7, seek to ensure that operational noise does not adversely affect neighbours. Policies S1 and HL3 of the Draft City Plan requires that noise does not adversely affect nearby land uses, supporting a healthy and inclusive City.
468. The impact of the proposed development in terms of noise associated with the operational stage of both the museum and student accommodation would be negligible. A deconstruction and construction management plan will be required by condition to ensure that noise and disturbance is controlled during the deconstruction and demolition phases and ensure nearby sensitive receptors amenity is not detrimentally impacted.
469. In regard to noise from plant, an acoustic report has been submitted with the application. This indicates that plant could be operated without detrimentally impacting on neighbouring properties in respect of noise and disturbance.
470. The Environmental Health team have been consulted and conditions have been included with the recommendation. This includes a condition to restrict the hours of use for the terrace between 23:00 and 07:00.

471. Due to there being nearby sensitive receptors it is considered necessary to restrict overnight servicing, therefore a condition will be included to ensure no servicing of the development shall take place between 23:00 and 07:00 Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays.
472. The proposed student accommodation has the potential to increase pedestrian movements around the site at a range of times and therefore potential for noise and disturbance to neighbouring properties. The applicant has submitted an outline Student Management Plan with the application, the details of which would be secured by the condition. The site would benefit from a comprehensive 24/7 management team, including on-site staff such as an accommodation manager, receptionist, cleaning staff and security staff who would be present throughout the day and night. The building would also be served by a comprehensive CCTV system to aid in the management of the building and surrounding spaces. As such, officers consider that adequate management of the development would likely ensure no adverse impacts are caused due to increased pedestrian movements around the site or increased number of users of the building.
473. Overall, subject to conditions, the development should not detrimentally impact on amenity of surrounding properties in respect of noise and disturbance. Therefore, the Proposed Development complies with London Plan Policy D13 and D14, Local Plan Policies DM3.5 and DM15.7, and Policies S1 and HL3 of the Draft City Plan.

Air Quality

474. Local Plan Policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 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.
475. The application includes an Air Quality Assessment which includes the likely impact of the proposed development on air quality as a result of the construction and operational phases of the development.
476. The development would be car-free and appropriate mitigation measures have been included in the Framework Travel Plan and the development would utilise ASHPs for operation therefore, subject to conditions and obligations, impacts are considered acceptable.
477. The City's Air Quality Officer has reviewed this proposal and has raised no objections.

478. Subject to the compliance with conditions, the proposed development would accord with Local Plan Policy CS15, policies HL2 and DE1 of the draft City Plan, policy SI1 of the London Plan which all seek to improve air quality.

Fire Safety

479. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage. Policy D5 requires development to incorporate safe and dignified emergency evacuation for all building users with a minimum of one lift per core to be a suitably sized fire evacuation lift.

480. Regulation 7(2) of the Building Regulations (as amended) restricts the use of combustible materials in the external walls of 'relevant buildings' over 18metres. The building is 74.9m AOD and this development would fall under the definition of a 'relevant building'. This would be relevant for the materials of the external walls of this development. The Applicant has confirmed that the building has been designed to be in accordance with Regulation 7(2) as a 'relevant building'.

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

482. The Health and Safety Executive (HSE), who are the statutory respondent in relation to fire safety on development of this nature, have been consulted on this application and are satisfied with the information provided within the application, including the submitted Fire Statement.

483. The District Surveyors have reviewed this application and raise no objection on the ground that the HSE have reviewed and are satisfied with the proposal.

484. The proposed development would therefore meet the requirements of Policy D5 and D12 of the London Plan.

Suicide Prevention Measures

485. Local Plan policy CS3 requires that security and safety measures are of an appropriate high-quality design. Draft City Plan Policy DE5 requires security and safety to be considered. The City recently adopted the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) which requires suicide prevention and safety measures to be considered and incorporated where necessary.

486. The proposal includes a accessible terraces at Levels 3 and 20 associated with the proposed student accommodation use.

487. The Applicant has confirmed that the rooftop terrace has been designed in line with the adopted Advice Note. This includes the following suicide prevention measures proposed to be incorporated:
488. The balustrades on all occupiable roofs are currently proposed to be 2.0m high above finish floor level. At the current stage of design development, the primary material to be laminated glass to provide an adequate safety barrier while maintaining visibility.
489. All aspects of the terraces are overlooked by large areas of glazing providing clear, unobstructed natural surveillance to all areas. A generous portion of this glazing will also be openable. This would be supplemented by adequate lighting.
490. Defensive planting would be located along the majority of the terrace edges and deter access and naturally contain publicly accessible areas to the north and south.
491. A CCTV system, monitored 24/7 by the operator, will also monitor the roof terraces.
492. The proposal is considered to comply with Local Plan Policy CS3 and draft City Plan Policy DE5 and the recommendations of the Planning Advice Note.
493. However, a condition is recommended for details of suicide prevention measures to be submitted and approved by the City prior to first occupation of the building.

Flood Risk and Sustainable Urban Drainage

494. Local Plan 2015 policy CS18 seeks to “reduce the risk of flooding from surface water throughout the City, by ensuring the development proposals minimise water use, reduce demands on the combined surface water sewer and sewerage network”. The use of Sustainable Drainage Systems (SuDS) is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan 2036.
495. The submitted Flood Risk Assessment identifies the site as lying in Flood Zone 1 (an area of very low flood risk) as such it is at a low risk of fluvial and tidal flooding.
496. The proposed drainage strategy includes capturing some runoff from the proposed building using a green roof and blue roof to limit the overall volume of water run-off that needs to be discharged and an attenuation tank below ground level.
497. The SuDS strategy has been developed to cope with potential changes in the climate.
498. The proposed Flood Risk and SUDS strategy would accord with policies CS18 of the Local Plan 2015, S15, CR2 and CR3 of the draft City Plan 2036 and policies SI12 of the London Plan.

499. The Lead Local Flood Authority and Thames Water have been consulted and recommended conditions to be attached.

HIA

500. Policy HL9 of the draft submission City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.

501. The applicants have submitted an HIA using evidence and assessments of impact within documents submitted with the planning application. The HUDU checklist has been satisfactorily completed and there are not expected to be any adverse health impacts resulting from the proposed development.

502. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:

- Provision of new jobs associated with the development
- Provision of a Museum
- Provision of public realm improvements and 278 works to provide towards a new pocket park enhancing the usability and attractiveness of the physical environment;
- 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 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.

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

- 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
- The requirement for a Student Accommodation Management Plan to minimise noise at the operational stage.

504. An appendix to the HIA has been provided which contains a Primary Health Care Assessment. As the development is targeted at students, it is assumed any impact on local healthcare services will have a minimal impact. The majority of students are expected to register with university affiliated GP's which they are directed to via the university websites. The North-East London CCG's Commissioner has confirmed with the applicant that space for additional GP provision within the City of London is not required.
505. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations.

Public Section Equalities Duty

506. 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.
507. 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
508. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
509. 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.
510. This application has been assessed against the Equality Act 2010 and any equality impacts identified.
511. 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.
512. As set out in the submitted Statement of Community Involvement (SCI), the consultation process included a targeted programme, which sought to understand the needs of the local community and identify opportunities for partnership and facilitation particularly in relation to part of the public benefits of the project.
513. Potential impacts of the proposed development on the nearby occupiers identified above, have been assessed, including the impacts on the use

and functionality of the spaces. 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.

514. In addition the proposed development has been assessed against policy GG1 of the New 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.

Human Rights Act 1998

515. 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”).
516. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) or right to enjoyment of property (Protocol 1, Article 1) including by causing harm to the amenity of those living in nearby residential properties and student residential properties, it is the view of officers that such interference is proportionate, in the public interest and strikes a fair balance between the interests of the owner of the site, those living nearby and the community as a whole.
517. As set out above, it is the view of officers that there would be no infringement of Article 8 or Article 1 of Protocol 1 of the ECHR.

CIL and Planning Obligations

518. 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.
519. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
520. From 1st April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London’s CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

521. 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	£1,625,280	£1,560,2689	£65,011

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£1,884,416	£1,790,195	£94,221
City Planning Obligations			
Local, Training, Skills and Job Brokerage	£690,480	£602,385	£6,095
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£1,906,080	£1,906,080	£0
Section 278 (Evaluation and Design) <i>Not indexed</i>	£50,000	£50,000	£0
S106 Monitoring Charge	£5,000	£0	£5,000
Total liability in accordance with the City of London's policies	£4,454,976	£4,349,660	£105,316

City's Planning Obligations

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

- Highway Reparation and other Highways Obligations
- (*incl. Highways Schedule of Condition Survey, site access, obtaining consents, licences etc*)
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (*Demolition & Construction*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Cycling Promotion Plan
- Construction Monitoring Costs £53,820 for the first year then £46,460 each subsequent year of the development
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement (*CoL*)
 - i. Relaying of footways along site frontages on Northumberland Alley, Carlisle Avenue and Crutched Friars
 - ii. New vehicular crossover on Carlisle Avenue
 - iii. Traffic Management Order changes for new vehicular access points
 - iv. Planting of three new street trees on Crutched Friars
 - v. Improvement works to Rangoon Street to create a new pocket park, should both this development and the adjacent development at Boundary House are implemented.
- Public Realm (*Specification & Management Plan*)
- Tree planting and contribution to provision of off-site tree planting
- Cultural Implementation Strategy
 - i. Heritage interpretation including Archaeology
- Museum
 - i. Selection of Museum operator
 - ii. 60 years rent and service charge free
 - iii. £0.5m initial donation to operator to facilitate wider fundraising for operational costs
 - iv. Specification, layout, opening times, admission policy and operation (including education program)
 - v. landscape works relating to the Museum artwork, seating and wayfinding
- Museum Management Plan
- Student Management Plan
- Universities nominations agreement
- Provision of affordable student accommodation
- Viability assessment of student accommodation
- 'Be Seen' Energy Performance Monitoring

523. Officers request that they be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.
524. The scope of the s278 agreement may include, but is not limited to, creation of a public courtyard at Northumberland Alley, pocket park at Rangoon Street, improving crossings and the surrounding footway/carriageway to accommodate increased pedestrian and cyclist movements and the planting of street trees.

Monitoring and Administrative Costs

525. 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.
526. 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.

Conclusion

527. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan (i.e. the London Plan and 2015 Local Plan) and relevant policies and guidance, SPDs and SPGs, relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.
528. The scheme delivers a high-quality development for student accommodation with a new museum space created. Whilst there would be a loss of office floorspace on the site, the City Corporation's consultant concludes that the none of the scenarios of retention of Friary Court in its existing office use, comprehensive refurbishment of this office use or redevelopment to provide new office space, are not financially viable and therefore it would not be viable in the longer term for future office use. Officers consider that the proposal would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. The student accommodation and museum will contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for 7 days per week, and contribute towards meeting Local Plan housing targets. This wider range of activity would contribute towards the City Corporation's ambitions for a City of Culture and Commerce and align with the City Corporation's Destination City agenda. The loss of office accommodation is therefore considered to be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan 2036.
529. The provision of student accommodation in a highly accessible location is supported in strategic and local planning terms. The provision of purpose-

built student accommodation in this mixed-use development will not prejudice the business function of the City, will not result in an excessive concentration of student housing, is not considered to have an adverse impact on residential amenity.

530. Whilst officers are concerned about the low level of light to some of the student bedrooms, in reviewing the amenity and breakout spaces and study areas would also have the option of various types of amenity, break out and study areas ranging from smaller quieter spaces to larger social spaces set over different levels, along with the use of the accessible roof terraces, on balance it is considered that the overall quality of the student accommodation is considered to be acceptable.
531. The purpose-built student accommodation would be considered and acceptable and would accord with London Plan Policy H15, Local Plan Policy DM21.7 and Draft City Plan Policy HS6.
532. The scheme would deliver significant cultural space in the form of a museum at ground, first and second floor comprising 3101m² and provide a new home for the Migration Museum.
533. The proposals make an effective use of limited land resource and enhance the buildings relationship with the adjacent public realm and townscape as well as connect with schemes recently completed (80 Fenchurch Street, Luminary Building Vine Street) and the proposed redevelopment of Boundary House which has a resolution to grant planning permission. The proposals are in overall general conformity with Local Plan strategic Policies CS10 (Design), London Plan Policies D3/D8 and emerging City Plan 2036 Strategic Policy S8 (Design).
534. The architectural form of the proposal would be commensurate in height, scale and massing with other buildings towards the 'foothills' of the City Cluster. The development would also successfully mediate the changes in scale in its local context. The cascading massing, highly articulated design, materials, colour and intended quality would add a level of richness and visual interest to the local townscape and skyline and would support the emerging vibrancy of the wider area. 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 the NPPF.
535. The proposed ground floor layout and design promotes an active and open façade, and prominent and distinctive entrances which make a positive contribution to the surrounding streets. 244m² of new public realm is proposed as part of the development and comprising a new courtyard area along Northumberland Avenue, there would also be planting, and seating integrated within the building façade adjacent to the public highway. The proposal additionally enables the delivery of a new pocket park on Rangoon Street through Section 278 works.
536. The proposal would deliver a positive relationship between the building and the public realm in accordance with London Plan Policy D3 and D8 and Local Plan Policies CS 10 and DM 10.1.

537. The development has regard for Local Plan Policy DM 3.2 and the Mayors Public London Charter promoting a safe, inclusive and welcoming environment. Hostile Vehicle Mitigation will be built into the plinth of the building. Natural surveillance would be significantly increased through the active outward looking ground floor activities and the increased footfall during the day and evening due to the Museum use and student accommodation attracting a more varied user group to the area.
538. The roof terrace locations and designs are well located making optimum uses of the flat roofs and designed with the lower terraces providing a visual contribution at a public pedestrian level. These elements are compliant with Local Plan policies, CS10, policy DM10.2 and DM10.3.
539. Historic Royal Places (HRP) were consulted on the application and have raised no objection. The proposal would preserve the ability to recognise and appreciate the Tower of London as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF. The extent of change the proposed development would have on the wider setting would be limited, the impact on the ability to appreciate the site's OUV would be neutral, and it would not harm the significance of the Tower of London whether in relation to the WHS, the individual listed buildings, or the Scheduled Monument. The proposals would accord with Local Plan policies CS13, emerging Local Plan policies S11, London Plan Policies HC2, HC3, HC4.
540. The proposal, by way of impact on setting, would preserve the heritage significance of designated heritage assets, and an appreciation of that significance. The proposals are considered to accord with Local Plan Policies CS 12 and DM 12.1, emerging City Plan policies S11 and HE1, London Plan Policy HC1, having accounted for and paying special regard to s66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF paragraphs 194-208.
541. The Greater London Archaeological Advisory Service (GLAAS) have recommended a pre-commencement condition requiring a timetable and scheme of archaeological evaluation to include: excavation, a watching brief and geotechnical monitoring. Subject to conditions and obligations the scheme is considered to be acceptable in regard to archaeology and accords with Policy DM12.4 of the Local Plan 2015 and policy HE2 of the draft City Plan 2036.
542. The proposed development is on track to achieve an "outstanding" BREEAM assessment rating. The upfront embodied carbon emissions can be reduced beyond the GLA's Standard Benchmark. Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible, residential 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 the new Part L 2021 and London Plan requirements.

543. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel. The provision of both long stay and short stay cycle spaces would meet the requirements of the London Plan.
544. The service area for both the museum and student accommodation is proposed at ground floor level. Delivery traffic and service vehicles would access the servicing bay via Carlisle Avenue. There would be restrictions on timings of deliveries between 0700 – 1000, 1200 – 1400, 1600 – 1900 and no night time servicing between the hours of 2300 on one day and 0700 on the following day to protect the amenity of nearby residential occupiers.
545. With regards Daylight, Sunlight and Overshadowing, taking into account the BRE Guidance, it is considered that the impact of the proposed development is considered to be acceptable with regards nearby dwellings, in accordance with the requirements of Local Plan policies DM10.7, DM21.3, London Plan policy D6 and Draft City Plan Policy DE8. It is also considered that the proposed development is acceptable with regards the internal daylight and sunlight levels and would provide adequate amenity to prospective students, according with London Plan policies D3, D6 and H15(A)(5), Local Plan policies DM10.7, DM15.7, DM21.3, DM21.5, and DM21.7, and draft City Plan policies DE8, DE9, and HS6.
546. There are no unacceptable adverse built development, construction or operational impacts anticipated for the proposed development and use, including cumulative impacts, and the recommendation is subject to conditions to mitigate impacts to surrounding uses, including the requirement to provide deconstruction and construction logistics plans, a scheme of protective works, a student accommodation management plan, a rooftop terrace management plan and relevant environmental health conditions including relating to noise. Therefore it is considered the proposed development complies with Local Plan Policies CS1, DM1.1, DM1.5, DM15.7, DM21.1, DM 21.7, and draft City Plan Policies HL3, S24, and SB1 regarding impact on amenity.
547. Therefore overall, it is considered that the proposed student accommodation use would not prejudice the primary business function of the City; would contribute to the balance and mix of uses in the immediate locality; and would not result in unacceptable adverse impacts on the amenity of neighbouring properties.
548. The proposals are considered to be in accordance with the development plan when taken as whole.
549. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
550. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

APPENDIX A

Background Papers

Application Documents

Design and Access Statement, by 3XN, September 2022;

Design and Access Statement Addendum, by 3XN, November 2022

Planning Statement, by DP9 Ltd, 13th September 2022;

Noise Planning Report, by Waterman Group Plc, 9th September 2022;

Air Quality Assessment, by Waterman Group Plc, September 2022;

Daylight and Sunlight Impacts on Neighbouring Properties; by GIA, 9th September 2022;

Internal Daylight, Sunlight & Overshadowing Assessment, by GIA, 12th September 2022;

Solar Glare Assessment, by GIA, 6th September 2022;

Outdoor Thermal Comfort; by GIA, 7th September 2022;

Preliminary Ecological Appraisal, by Focus Environmental Consultants, 26th August 2022;

Biodiversity Net Gain Assessment, by Focus Environmental Consultants, 6th September 2022;

Flood Risk Assessment, by Waterman Group Plc, September 2022;

Drainage Strategy and SuDS Report, by Ramboll, 7th September 2022;

Heritage, Townscape and Visual Impact Assessment, by The Townscape Consultancy, September 2022;

Archaeological Desk Based Assessment, by MOLA, September 2022;

Updated Archaeological Desk Based Assessment, by MOLA, November 2022;

Preliminary Risk Assessment, by Waterman Group Plc, 8th September 2022;

Geoenvironmental and Geotechnical Desk Study, by Ramboll, 7th September 2022;

Wind Microclimate, prepared by GIA, 9th September 2022;

Justification for Loss of Office Report, by Cushman and Wakefield, August 2022;

Financial Viability Assessment, by Montague Evens; 31st January 2023;

Updated Financial Viability Assessment, by Montague Evens; 7th February 2023;

Statement of Community Involvement, by Kanda, September 2022;

Sustainability Statement, by Waterman Group Plc, 13th September 2022;

Energy Assessment, by Waterman Group Plc, 12th September 2022;

Updated Energy Assessment, by Waterman Group Plc, February 2023;

Whole Life Carbon Assessment, prepared by Waterman Group Plc, 12th September 2022;

Updated Whole Life Carbon Assessment, by Waterman Group Plc, November 2022;

Circular Economy Statement, prepared by Waterman Group Plc, 12th September 2022;

Updated Circular Economy Statement, by Waterman Group Plc, February 2023;

BREEAM Pre-Assessment Planning Report, by Waterman, 5th September 2022;

Transport Assessment, by Pell Frischmann; 7th September 2022;

Arboricultural Report, by Focus Environmental Consultants, September 2022;

Detailed UXO Risk Assessment, by First Defence, 12th September 2022;

Construction Logistics Plan, by Pell Frischmann, September 2022;

Demolition Logistics Plan; by Cantillon, 12th September 2022;

Construction Management and Logistics Plan; by Dominvs, 12th September 2022;

Student Housing Demand and Supply Study, prepared by JLL, 9th September 2022;

Economic Benefits Statement, by Hatch, September 2022;

Health Impact Assessment, by Hatch, September 2022;

Student Management Plan, CRM Students, September 2022;

London Plan Fire Statement, by OFR, 7th September 2022;

Gateway One Fire Statement, by OFR, 7th September 2022; and

Cultural Plan, by Futurecity, 2nd September 2022.

Consultee Responses

Memo, Environmental Health Officer, 15/12/2022

Memo, Air Quality Officer, 20/12/2022

Email, NATS Safeguarding, 05/10/2022

Email, Heathrow Airport, 06/10/2022

Email, City Airport, 06/10/2022

Memo, Air Quality Officer, 07/10/2022

Memo, Lead Local Flood Authority (District Surveyor's Office), 18/10/2022

Email, District Surveyor's Office, 21/10/2022

Letter, GLAAS (Historic England), 24/10/2022

Email, Thames Water, 24/10/2022

Memo, Access Team, 27/10/2022

Memo, Health and Safety Executive, 27/10/2022

Letter, Historic England, 07/11/2022

Memo, Contract and Drainage Service, 14/11/2022

Email, Cleansing, 21/11/2022

Letter, Twentieth Century Society, 29/11/2022

Memo, Access Team, 01/12/2022

Email, District Surveyor's Office, 07/12/2022

Email, Heathrow Airport, 07/12/2022

Email, NATS Safeguarding, 08/12/2022

Letter, City Airport, 12/12/2022

Email, GLAAS (Historic England), 13/12/2022

Email, Thames Water, 13/12/2022

Letter, LB of Hackney, 14/12/2022

Memo, Environmental Health Officer, 15/12/2022

Letter, Historic England, 15/12/2022

Memo, Environmental Resilience Officer, 16/12/2022

Memo, Health and Safety Executive, 09/01/2023

Comment, Historic Royal Palaces, 03/02/2023

Representations

Letter, Aldgate Connect, 17/10/2022
Email, Maxim Shport & Olivia Hall, 21/10/2022
Comment, Caleb Meath, 21/10/2022
Email, Paul Pavlou, 22/10/2022
Comment, Colm Malmberg, 22/10/2022
Email, Keith Mansfield, 23/10/2022
Comment, Mark Henwood, 23/10/2022
Letter, Camilla Blower and Johannes Resch, 24/10/2022
Comment, Jayne Evans, 24/10/2022
Comment, Gaelle Yamdjeu Tiabo, 24/10/2022
Comment, Ivan Morozov, 24/10/2022
Email, Alan Perrin, 26/10/2022
Email, Giles Leroy, 26/10/2022
Email, Giordano Suergiu, 26/10/2022
Email, Graeme Smith, 26/10/2022
Email, James O'Doherty, 26/10/2022
Email, Tiziana Salta, 26/10/2022
Email, Uniboss Ltd, 26/10/2022
Comment, Calum Clow, 26/10/2022
Email, H and C O Mason, 26/10/2022
Letter, R N G Robinson, 26/10/2022
Email, David Walsh, 27/10/2022
Email, Kurt van der Linde, 27/10/2022
Email, Stephen Sutcliffe, 27/10/2022
Letter, Timothy Jordan, 27/10/2022
Petition, 1 Pepys Street Residents (29 Signatures), 27/10/2022
Email, Keith Mansfield, 28/10/2022
Email, A Taylor & C Hall, 28/10/2022
Email, Jack Warren, 01/11/2022
Letter, Anthony Mellalieu, 01/12/2022

Letter, Lord Mayor Nicholas Lyons, James Tumbridge CC, Jason Groves CC, Aaron D'Souza CC, 15/12/2022

Letter, Migration Museum, 30/01/2023

Letter, Eastern City BID, 02/02/2023

Letter, V&A, 02/02/2023

Letter, Derwent London, 03/02/2023

Letter, Horniman Museum and Gardens, 08/02/2023

Letter, Museum of London, 10/02/2023

Letter, Professor Philippe Sands KC, 10/02/2023

Letter, Sir Lloyd Dorfman CVO CBE, 10/02/2023

Letter, Iqbal Wahhab OBE, 12/02/2023

APPENDIX B

Local Plan Policies

CS1 Offices

DM 1.1 Protection of office accommodation

CS2 Utilities Infrastructure

DM 2.1 Infrastructure provision and connection

CS3 Security and Safety

DM 3.1 Self-containment in mixed use developments

DM 3.2 Security measures in new development and around existing buildings

CS4 Planning Contributions

CS8 Aldgate

CS10 Design

DM 10.1 New development

DM 10.2 Design of green roofs and walls

DM 10.3 Roof gardens and terraces

DM 10.4 Environmental enhancement

DM 10.7 Daylight and sunlight

DM 10.8 Access and inclusive design

CS11 Visitors, Arts and Culture

DM 11.2 Public art

CS12 Historic Environment

DM 12.1 Managing change affecting all heritage assets and spaces

DM 12.2 Development in conservation areas

DM 12.4 Ancient monuments and archaeology

CS13 Protected Views

CS15 Sustainable Development and Climate Change

DM 15.1 Sustainability requirements

DM 15.2 Energy and CO2 emissions assessments

DM 15.3 Low and zero carbon technologies

DM 15.4 Offsetting of carbon emissions

DM 15.5 Climate change resilience and adaptation

DM 15.6 Air quality

DM 15.7 Noise and light pollution

DM 15.8 Contaminated land and water quality

CS16 Public Transport, Streets and Walkways

DM 16.1 Transport impacts of development

DM 16.2 Pedestrian movement

DM 16.3 Cycle parking

DM 16.4 Facilities to encourage active travel

DM 16.5 Parking and servicing standards

CS17 Waste

DM 17.1 Provision for waste in development schemes

DM 17.2 Designing out construction waste

DM 18.2 Sustainable drainage systems (SuDS)

DM 18.3 Flood protection and climate change resilience

CS19 Open Spaces and Recreation

DM 19.1 Additional open space

DM 19.2 Biodiversity and urban greening

CS21 Housing

DM 21.1 Location of new housing

DM 21.3 Residential environment
DM 21.7 Student housing and hostels
DM 22.2 Provision of public toilets

London Plan Policies

Policy GG1 (Building strong and inclusive communities)
Policy GG2 (Making the best use of land)
Policy GG3 (Creating a healthy city)
Policy GG5 (Growing a good economy)
GG6 (Increasing efficiency and resilience)
Policy SD4 (The Central Activities Zone (CAZ))
Policy SD5 (Offices, other strategic functions and residential development in the CAZ)
Policy D3 (Optimising site capacity through the design-led approach)
Policy D4 (Delivering good design)
Policy D5 (Inclusive Design)
Policy D8 (Public Realm)
Policy D11 (Safety, security and resilience to emergency)
Policy D12 (Fire Safety)
Policy D14 (Noise)
Policy H15 (Purpose Built Student Accommodation)
Policy S1 (Developing London's social infrastructure)
Policy E11 (Skills and opportunities for all)
Policy HC1 (Heritage conservation and growth)
Policy HC3 (Strategic and Local Views)
Policy HC4 (London View Management Framework)
Policy HC5 (Supporting London's Culture and Creative Industries)
Policy G1 (Green infrastructure)
Policy G4 (Open space)
Policy G5 (Urban greening)
Policy G6 (Biodiversity and access to nature)
Policy SI1 (Improving air quality)
Policy SI2 (Minimising greenhouse gas emissions)
Policy SI3 (Energy infrastructure)
Policy SI4 (Managing heat risk)
Policy SI7 (Reducing waste and supporting the circular economy)
Policy SI13 (Sustainable drainage)
Policy SI12 (Flood risk management)
Policy SI13 (Sustainable drainage)
Policy T1 (Strategic approach to transport)
Policy T2 (Healthy streets)
Policy T3 (Transport capacity, connectivity and safeguarding)
Policy T4 (Assessing and mitigating transport impacts)
Policy T5 (Cycling)
Policy T6 (Car parking)
Policy T7 (Deliveries, servicing and construction)

London Plan Supplementary Planning Guidance

Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014);
Central Activities Zone SPG (GLA, March 2017);
Character and Context SPG (GLA, June 2014);
Circular Economy Statement Guidance (GLA, April 2020 – draft)
Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014);
Culture and Night-Time Economy SPG (GLA, November 2017);
Energy Planning Guidance (GLA, April 2020);
London Environment Strategy (GLA, May 2018);
London View Management Framework SPG (GLA, March 2012);
Public London Charter (GLA, March 2020 – draft);
Sustainable Design and Construction SPG (GLA, April 2014).

Local Plan Supplementary Planning Guidance

Air Quality SPD (CoL, July 2017);
Archaeology and Development Guidance SPD (CoL, July 2017);
City Lighting Strategy (CoL, October 2018);
City Public Realm SPD (CoL, July 2016);
City Transport Strategy (November 2018 – draft);
City Waste Strategy 2013-2020 (CoL, January 2014);
Open Space Strategy SPD (CoL, January 2015);
Protected Views SPD (CoL, January 2012).
Planning Advice Notes on Sunlight
City of London Wind Guidelines (2019)
City of London Thermal Comfort Guidelines (2020)

Draft City Plan Policies

Policy S1 (Healthy and inclusive City)
Policy HL1 (Inclusive buildings and spaces)
Policy HL2 (Air quality)
Policy HL3 (Noise and light pollution)
Policy HL5 (Location and protection of social and community facilities)
Policy HL9 (Health Impact Assessment (HIA))
Policy S2 (Safe and Secure City)
Policy SA1 (Crowded places)
Policy SA3 (Designing in security)
Policy S4 (Offices)
Policy OF1 (Office development)
Policy OF2 (Protection of Existing Office Floorspace)
Policy S7 (Smart Infrastructure and Utilities)
Policy IN2 (Infrastructure Capacity)
Policy DE1 (Sustainability Standards)
Policy DE2 (New development)
Policy DE3 (Public realm)
Policy DE4 (Pedestrian permeability)
Policy DE5 (Terraces and Viewing Galleries)
Policy DE6 (Shopfronts)
Policy DE8 (Daylight and sunlight)

Policy VT1 (The impacts of development on transport)
Policy VT2 (Freight and Servicing)
Policy VT3 (Vehicle Parking)
Policy S10 (Active Travel and Healthy Streets)
Policy AT1 (Pedestrian Movement)
Policy AT2 (Active Travel including Cycling)
Policy AT3 (Cycle Parking)
Policy S11 (Historic Environment)
Policy HE1 (Managing Change to Heritage Assets)
Policy HE2 (Ancient Monuments and Archaeology)
Policy SB1: Culture Mile Impacts
Policy S13 (Protected Views)
Policy S14 (Open Spaces and Green Infrastructure)
Policy S23 (Smithfield and Barbican)
Policy S24: Culture Mile Implementation
Policy OS1 (Protection and provision of open spaces)
Policy OS2 (City Greening)
Policy OS3 (Biodiversity)
Policy S15 (Climate Resilience and Flood Risk)
Policy CR1 (Overheating and Urban Heat Island Effect)
Policy CR2 (Flood Risk)
Policy CR3 (Sustainable drainage systems (SuDS))
Policy S16 (Circular Economy and Waste)
Policy CE1 (Zero Waste City)

APPENDIX C

Methodology for daylight (including radiance), sunlight and overshadowing assessment

Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space.

Local Plan Policy DM10.7 'Daylight and Sunlight' 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 Building Research Establishment's (BRE) guidelines 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (2022).

Policy DE8: 'Daylight and sunlight' of the Draft City Plan 2036 states that development proposals will be required to demonstrate that the 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.

Local Plan Policy DM21.3 seeks to protect the residential environment including daylight and sunlight.

Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations.

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.

Within the BRE Guidance, it states that the methods of assessment can be applied to non-domestic buildings where the occupants have a reasonable expectation to light. In this case it is Officers' view that the impact to student residential should be considered.

Methods of Assessment

Daylight to Existing Buildings

The BRE guidelines present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

- 1. Daylight to windows: Vertical Sky Component (VSC):** a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
- 2. Daylight Distribution: No Sky Line (NSL):** The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

The BRE Guide recommends compliance with both the VSC and daylight distribution (NSL) guidelines.

Sunlight to Existing Buildings

Sunlight to windows: Annual Probable Sunlight Hours (APSH): Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

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

To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).

The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

Overshadowing

Sunlight to open spaces: Sunlight Hours on the Ground (SHOG): The BRE guidelines recommends 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.

Radiance Assessment

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.

Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the Radiance methodology, radiance-based assessments can draw upon the BRE's recommended Average Daylight Factor (ADF) target values, which 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 BRE guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.

Whilst student accommodation is not explicitly discussed within the BRE Guidelines, it is understood that it is common practice is to assign a minimum target of 1% ADF to student rooms (the target for bedrooms), which is considered by officers to be reasonable.

Radiance assessment results are presented as floor plans colour rendered to illustrate the individual daylight factors within room, which range between 0% and 5%. In addition, the average value of the individual daylight factors within a room can be expressed as a 'radiance based' ADF percentage for the room as a whole.

It should be noted that the Radiance Assessment undertaken is not meant to replace the submitted daylight and sunlight assessments, but to provide a further way to illustrate daylight changes within habitable rooms in the neighbouring properties.

Setting Alternative Target Values (including Mirror Massing)

Appendix F of the BRE guidelines provides advice on setting alternative target values for daylight and sunlight. This notes that the numerical target values are purely advisory and different targets may be used based on the characteristics of the proposed development and/or its location.

Alternative targets may be generated from the scale/layout of existing development within the surrounding context or be based on an extant planning permission. The BRE guide provides an example of a narrow mews in an historic city centre where the VSC values derived from the obstruction angle

could be used as a target value for development in that street if new development is to match the existing layout.

The guide notes that a similar approach may be adopted in cases where an existing building has windows that are unusually close to the site boundary and taking more than their fair share of light. In that case, to ensure that new development matches the height and proportions of existing buildings, the VSC and APSH targets for the relevant windows could be set to those for a 'mirror-image' building of the same height and size, an equal distance away on the other side of the boundary.

In undertaking assessments a judgement is made as to the level of impact on affected windows and rooms. Where there is a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment and have become part of an industry standard utilised by Daylight and Sunlight specialists. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which is or is not acceptable.

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).

SCHEDULE

APPLICATION: 22/00882/FULMAJ

Friary Court 65 Crutched Friars London

Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (770 rooms) and associated amenity space (Sui Generis); Museum use at part ground, first and second floor levels (Use Class F1(c))(+3101sq.m GIA); hard and soft landscaping; ancillary plant and servicing; and associated works.

Additional information and amendments have been submitted in relation to the cultural offer proposed at ground, first and second floor to provide space for the Migration Museum.

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 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 3 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.
- 4 Before any works including demolition are begun a survey of the highways and other land at the perimeter of the site shall be carried out and submitted to the Local Planning Authority showing the existing Ordnance Datum levels of the adjoining streets and open spaces.

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 to create a record of the conditions prior to changes caused by the development.
- 5 Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement 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 Plans 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 construction work commencing in order to establish the extent of recycling and minimised waste from the time that construction start.

- 6 No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and
- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) organisation to undertake the agreed works
 - B. Where appropriate, details of a programme for delivering related positive public benefits.
 - C. The programme for post- investigation assessment and subsequent analysis, publication and dissemination and deposition of resulting material.
- This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

The written scheme of investigation will need to be prepared and implemented by a suitably professionally credited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

- 7 There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).
- REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and 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.

- 8 Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an updated detailed Circular Economy Statement, to include a site waste management plan, shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building elements. 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 Plans 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 construction work commencing in order to establish the extent of recycling and minimised waste from the time that construction start.

- 9 Prior to the commencement of the development, excluding demolition, an updated 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's Standard Benchmark and setting out further opportunities to achieve the GLA's Aspirational Benchmark 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 Page 146 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 Prior to the commencement of development, excluding demolition, details of the facade system confirming the detailed design in relation to reducing the operational and embodied carbon impact across all life-cycle stages that would result from the proposed facade system and materials, and the frequency of replacement cycles, is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings and shall remain in place for the lifetime of the development.

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. 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.

- 11 Prior to the commencement of development details of the utility connection requirements of the development (or relevant part thereof) including all proposed service connections, communal entry chambers, the proposed service provider and the anticipated volume of units required for the development and a programme for the ordering and completion of service connections from the utility providers have been submitted to the local planning authority for approval in writing. No service connections shall be ordered in connection with the development unless in accordance with the final programme approved pursuant to this condition.

REASON: To ensure that the utilities infrastructure arising from the development are met in accordance with policy CS2 of the Local Plan.

- 12 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

- 13 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority

which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class A use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class A use takes place.

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

- 14 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

- 15 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.

- 16 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.

- 17 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

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

- 18 Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken 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 must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

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

- 19 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.

- 20 Prior to the commencement of the development, a Fire Statement, in the form of an independent fire strategy produced by a third party suitably qualified assessor shall be submitted to and approved in writing by the Local Planning Authority. The statement should detail how the development proposal will function in terms of:

1. The building's construction: methods, products and materials used, including manufacturers' details;
2. The means of escape for all building users: stair cores, escape for building users who are disabled or require level access, and the associated evacuation strategy approach;
3. Features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans;
4. Access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these;
5. How provision will be made within the site to enable fire appliances to gain access to buildings; and
6. Ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

The development shall be implemented in accordance with the approved Fire Statement and retained as such for the lifetime of the development.

REASON: In order to achieve the highest standards of fire safety and ensure the safety of all building users.

- 21 Prior to the commencement of development, a disabled access and management plan shall be submitted to the Local Planning Authority which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for the publicly accessible spaces. The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.

REASON: To ensure the hotel provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.

- 22 Prior to the commencement of the development, excluding 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.

- 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 including blue roofs, rainwater pipework, rainwater harvesting systems, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 l/s, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 115m³ ; (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. Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) A Lifetime Maintenance Plan for the SuDS system to include: - A full description of how the system would work, it's aims and objectives and the flow control arrangements; - A Maintenance Inspection Checklist/Log; Page 2 of 2 - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3

- 24 No development shall be occupied until confirmation has been provided that either all water network upgrades required to accommodate the additional demand to serve the development have been completed or a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason: Thames Water have stated that the development may lead to no or 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.
- 25 Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the bedrooms does not exceed NR30 attributable to the Class F1 use of the ground floor and/or basement levels. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter. REASON: To protect the amenities of residential occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.
- 26 Details of the position and size of the green/blue roof(s), the type of planting and a substantial contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and

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

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

- 27 Prior to the commencement of development details of the rainwater harvesting and greywater collection systems, to include the location of tanks and areas/locations of use for the collected water, shall be submitted to and approved in writing by the Local Planning Authority. REASON: To assist the environmental sustainability of the development and its resilience and adaptation to climate change in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.5

- 28 Prior to implementation, details shall be submitted to and approved in writing by the local planning authority to demonstrate that a opportunities have been explored to achieve a target of 0.4 urban greening factor and if not achievable provide a justification as to why a higher UGF could not be achieved. The development shall be carried out in accordance with those approved details and a minimum urban greening factor target of 0.39 shall be maintained for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

- 29 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:

Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;

- (b) details of the proposed new facades including details of a typical bay of the development for each facade, entrances fenestration, soffits, handrails and balustrades;
- (c) details of canopies;
- (d) irrespective of approved drawings, typical facade details, including jointing and any necessary expansion/movement joints;
- (e) irrespective of approved drawings details of ground and first floor elevations including all entrances, integrated seating, art panels/ vitrines and information boards;
- (f) full details of terraces, including all elevations, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required
- (g) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
- (h) details of all drainage, irrigation and rainwater harvesting;
- (i) details of the integration of M&E and building services into the external envelope;
- (j) details of service vehicle, fire escape and cycle store entrances and related art work
- (k) details of external ducts, vents, louvres and extracts;
- (m) details of natural ventilation to include location of opening vents and extent of natural ventilation in relation to floorspace;
- (n) details of all ground level surfaces including materials to be used

- (o) details of external surfaces within the site boundary including hard and soft landscaping;
- (p) details of the arrangements for the provision of refuse storage and collection facilities within the curtilage;
- (q) details of junctions with adjoining premises;
- (l) details of signage for all aspects of the building other than the Museum
- (m) Details of access to the roof for cleaning and maintenance, including details of mansafe equipment.

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 and DM12.1

- 30 Prior to the occupation of any part of the building all exposed flank or party walls must be faced or treated in accordance with details to be approved by the local planning authority in writing before any such works are commenced 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: DM10.1, DM2.1

- 31 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:
1. Methodology for removal of Two Crutched Friars by M Black at the southeast corner of Friary Court
 2. Inspection and condition report of the statue following removal
 3. Details of transportation and storage of the statue
 4. Specification of repairs and alterations to the statue to enable reinstatement
 5. Methodology for reinstatement, heritage interpretation and location
6. The building shall not be occupied until the statue has not been reinstated
7. The above works shall be undertaken by an appropriate and qualified craftsman
- 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
- 32 All Parish Markers and commemorative plaques on the existing building shall be carefully removed prior to demolition commencing, stored for the duration of building works, reinstated and retained for the life of the building on the new building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby.
- 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.
- 33 Before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
- 34 Before any works thereby affected are begun, details of all balustrades to external terrace areas and associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life 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: DM3.2, DM10.1, DM10.5, DM12.2.

- 35 Prior to the commencement of the relevant works, a detailed room layout shall be provided to the Local Planning Authority to demonstrate that student bedrooms have been laid out and designed to maximise daylight to desks/study areas and position these within the brightest parts of each room.

Reason: To maximise daylight and sunlight to areas used for more light sensitive activities in accordance with the requirements of Local Plan Policies DM10.7, DM21.3 and DM21.5, London Plan Policies D3, D6 and H15(A)(5) and Draft City Plan Policy DE8.

- 36 Prior to any works to the trees, a method statement shall be submitted to and approved by the local planning authority setting out the methodology for the transplanting of any suitable trees to an offsite location or for felling any unsuitable trees, the evaluation process for assessing how the timber may be reused within the development. Within 1 year from the approval of such details, a statement shall be submitted to and approved by the local planning authority setting out the findings of the timber analysis and the details of how the timber will be reused within the development. The development shall be carried out in accordance with the approved details.

Reason: To ensure existing trees can either be replanted in a new location off site or used in the new development as timber features further to policies G7 of the London Plan, Policy DM19.2 of the Local Plan and Draft Local Plan Policy OS4.

- 37 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 green roofs, and method of irrigation;

(b) details of the final Urban Greening Factor of the scheme;

(c) Irrigation, including provision for harvesting rainwater run-off from surfaces to

supplement irrigation;

(g) Details of all soft landscaping including species and contribution to enhance

biodiversity;

(j) Maintenance plans for all proposed landscaping;

(k) Planters;

(l) Contribution to biodiversity enhancement of all landscaping including greening,

green walls and green roofs.

(m) Paving details, including all ground floor areas between building line and public highway boundary, in accordance with the City Public Realm Technical Manual

(n) Lighting

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.

- 38 Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of:

- lighting layout/s;
- details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);
- a lighting control methodology;
- proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;
- all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass;
- details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.

All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15 and emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036.

- 39 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority,

and the development shall be carried out in accordance with the approved details.

REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.

- 40 Prior to the installation of any generator a report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time. Reason In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.
- 41 Prior to the occupation of the roof terraces, details of suicide prevention measures to prevent jumping or falling from the development shall be submitted to and approved in writing by the Local Planning Authority. All development pursuant to this permission shall be carried out in accordance with the approved details and maintained for the life of the building.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure adequate safety measures are in place in accordance with Local Plan Policy CS3 and emerging draft City Plan 2036 Policy DE2 and DE5.
- 42 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 'Excellent' 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.
- 43 No later than 3 months after completion of the building and prior to the development being occupied, a post-completion Circular Economy Statement 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 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 three months post as-built design completion, unless otherwise agreed.

Reason: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

- 45 Within 6 months of completion details of climate change resilience measures 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.

- 46 No servicing of the approved development by motorised vehicles shall occur during the hours of 0700 - 1000, 1200 - 1400 and 1600 - 1900 on any day

REASON: To ensure that the development does not have an adverse impact on the free flow of traffic or highway safety in the surrounding streets in accordance with the following policy of the Local Plan: DM16.1.

- 47 No doors, gates or windows at ground floor level shall open over the public highway.

REASON: In the interests of public safety and to comply with section 153 of the Highways Act 1980.

- 48 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 587no. long stay pedal cycles and 54 no. short stay pedal cycles. 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. A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.

REASON: To ensure 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.

- 49 If within a period of five years from the date of the planting of any tree, that tree or any tree planted in replacement for it, is removed, uprooted, destroyed, dies or becomes, in the opinion of the Local Planning Authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.

REASON: In order to ensure the continued presence of trees on the site in the interest of visual amenity in accordance with the following policies of the Local Plan: DM10.4, DM19.2.

- 50 No flues, ductwork, soil stacks, soil vent pipes or any other pipe-work other than rainwater pipes shall be fixed to the elevations of the building unless shown on the drawings hereby approved.

REASON: To ensure that the external appearance of the building is satisfactory in accordance with the following policy of the Local Plan: DM10.1.

- 51 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM21.3.

- 52 A minimum of 10% of the student accommodation rooms within the development shall be wheelchair accessible as set out in the approved details and retain thereafter for the lifetime of the development.

REASON: To ensure the development provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and London Plan Policy D5.

- 53 The car parking space suitable for use by disabled people shall be provided on the premises in accordance with the drawings hereby approved and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors.
REASON: To ensure provision of suitable parking for disabled people in accordance with the following policies of the Local Plan: DM16.5, draft Local Plan 2036: 6.13D and 6A.2 and London Plan: T6.5.
- 54 The provision of a Changing Places facility shall be provided, within the museum, in line with British Standard BS 8300-2. The changing places toilet shall only be used by/for those with a need for specialist assisted toilet and changing facility.
REASON: To ensure that sufficient accessible sanitary facilities are provided, and that the museum provides a fully accessible and inclusive facility in accordance with London Plan Policy S6 and Local Plan Policy 10.8 and London Plan Policy D5.
- 55 One electric charging point must be provided within the delivery and servicing area for the use of delivery and servicing vehicles and retained for the life of the development.
REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16 and draft Local Plan 2036 Policy VT2.
- 56 Pre-booked goods delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the loading bay 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.
- 57 The refuse collection and storage facilities shown on drawings 65CF-3XN-XX-DR-AX-1200 and 65CF-3XN-XX-DR-AX-1200, 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.
- 58 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.
- 59 All residential premises in the development shall be designed and constructed to attain the following internal noise levels: Bedrooms- 30dB

L_{Aeq}, T* and 45dB L_{Amax} Living rooms- 30dB L_{Aeq}, T* *T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00-23:00. A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any part of the building. REASON: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3 and D21.5.

- 60 (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.
- 61 The roof terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 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.
- 62 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.
- 63 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

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

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

- 65 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.

- 66 The maximum height of the building shall comply with the approved drawings and shall not exceed 74.9m APOD including , plant, flues, lift over run, and other excrescences at roof level including within the plant room located at level 20.

REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

- 67 No plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

- 68 At all times when not being used for cleaning or maintenance the window cleaning Davit Arm, associated building maintenance and cleaning equipment, and other similar equipment shall be stored internally of the building envelope and shall at no time be stored on the roof of the building. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

- 69 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: 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.

- 70 All hard and soft landscaping on the ground, on the building elevations, terraces and roofs shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. The scheme should include the following details: (a) Irrigation, including provision for harvesting rainwater run-off from road ground and roof surfaces to supplement irrigation; (b) Soil including details of the type and depths of soil and substrates; (c) 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; (d) Planting pit size and construction, tree guards; (e) Details of all soft landscaping including species and contribution to enhance biodiversity; (f) Seating; (g) Paving materials; (h) Details of features to enhance biodiversity; and (h) maintenance plans for all proposed landscaping. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority. REASON: In the interests of visual amenity and to achieve environmental benefits in accordance with the following policies of the Local Plan: DM10.1, DM10.2, DM10.3, DM10.4, DM19.1, DM19.2
- 71 The floorspace within the development marked as museum on the floor plans at ground Floor, first floor and second floor level (3101m²) hereby approved, shall be used for Museum use (Class F1(c)) and for no other purpose (including any other purpose within Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure that active public uses are retained to ground floor.
- 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:
65CF-3XN-XX-XX-DR-AX-0010 - Site Location Plan
65CF-3XN-XX-00-DR-AX-1298 - Basement 2 - Proposed
65CF-3XN-XX-00-DR-AX-1299 - Basement 1 - Proposed
65CF-3XN-XX-00-DR-AX-1200 Rev 01 - Ground Floor Plan - Proposed

65CF-3XN-XX-01-DR-AX-1201 Rev 01 - Level 01 Floor Plan - Proposed

65CF-3XN-XX-02-DR-AX-1202 Rev 01 - Level 02 Floor Plan - Proposed

65CF-3XN-XX-03-DR-AX-1203 - Level 03 Floor Plan - Proposed

65CF-3XN-XX-04-DR-AX-1204 - Level 04 Floor Plan - Proposed

65CF-3XN-XX-04-DR-AX-1205 - Level 05 Floor Plan - Proposed

65CF-3XN-XX-04-DR-AX-1206 - Level 06 Floor Plan - Proposed

65CF-3XN-XX-04-DR-AX-1207 - Level 07 Floor Plan - Proposed

65CF-3XN-XX-04-DR-AX-1208 - Level 08 Floor Plan - Proposed

65CF-3XN-XX-05-DR-AX-1209 - Level 09 Floor Plan - Proposed

65CF-3XN-XX-05-DR-AX-1210 - Level 10 Floor Plan - Proposed

65CF-3XN-XX-05-DR-AX-1211 - Level 11 Floor Plan - Proposed

65CF-3XN-XX-05-DR-AX-1212 - Level 12 Floor Plan - Proposed

65CF-3XN-XX-05-DR-AX-1213 - Level 13 Floor Plan - Proposed

65CF-3XN-XX-06-DR-AX-1214 - Level 14 Floor Plan - Proposed

65CF-3XN-XX-06-DR-AX-1215 - Level 15 Floor Plan - Proposed

65CF-3XN-XX-07-DR-AX-1216 - Level 16 Floor Plan - Proposed

65CF-3XN-XX-07-DR-AX-1217 - Level 17 Floor Plan - Proposed

65CF-3XN-XX-07-DR-AX-1218 - Level 18 Floor Plan - Proposed

65CF-3XN-XX-07-DR-AX-1219 - Level 19 Floor Plan - Proposed

65CF-3XN-XX-07-DR-AX-1220 - Level 20 Floor Plan - Proposed (dated 07/02/2023)

65CF-3XN-XX-38-DR-AX-1221 - Roof Plan - Proposed (dated 07/02/2023)

65CF-3XN-XX-XX-DR-AX-2100 Rev 01 - North & South Elevation - Proposed

65CF-3XN-XX-XX-DR-AX-2101 Rev 01 - East & West Elevation - Proposed

65CF-3XN-XX-XX-DR-AX-2102 - Internal North & South - Proposed

65CF-3XN-XX-XX-DR-AX-2103 - Internal West - Proposed

65CF-3XN-XX-XX-DR-AX-3100 - Section A, B & C - Proposed (dated 07/02/2023)

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 This approval relates only to the details listed above and must not be construed as approval of any other details shown on the approved drawings.
- 3 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:
 - (a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has Page 8 of 11 already been granted, further planning approval will also be required.
 - (b) Installation of engine generators using fuel oil.
 - (c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.
 - (d) Alterations to the drainage and sanitary arrangements.
 - (e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular: the identification, encapsulation and removal of asbestos in accordance with a planned programme; provision for window cleaning (internal and external) to be carried out safely.
 - (f) The use of premises for the storage, handling, preparation or sale of food.
 - (g) Use of the premises for public entertainment.
 - (h) Approvals relating to the storage and collection of wastes.
 - (i) The detailed layout of public conveniences.
 - (j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.
 - (k) The control of noise from plant and equipment;
 - (l) Methods of odour control.
- 4 4. The Director of Markets and Consumer Protection (Environmental Health Team) advises that: Noise and Dust
 - (a) The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to Page 9 of 11 establish hours of work for noisy operations.

(b) Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c) Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d) Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department. Air Quality

(e) Compliance with the Clean Air Act 1993 Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant. Boilers and CHP plant

(f) The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NOx emission rate.

- 5 The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health. Compliance with the Clean Air Act 1993 Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant

- 6 Any building proposal which includes catering facilities will be required to be constructed with adequate grease traps to the satisfaction of Thames Water Utilities Limited or their contractors.
- 7 Many species are protected under legislation such as the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017. A contravention of those statutory provisions may constitute a criminal offence. The grant of this consent/planning permission does not override any statutory requirement to notify Natural England and/or obtain a licence prior to carrying out activities which may harm or disturb protected species such as bats.
- 8 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.

- 9 Regarding the public realm, the footways should have a footway clear zone of a preferred minimum of 2000mm and an absolute minimum of 1000mm. This is to comply with London Plan's Healthy Streets act.
- 10 Thames Water advice:
As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483.

Thames Water would recommend that petrol, oil interceptors be fitted in all car parking, washing, repair facilities. Failure to enforce the effective use of petrol, oil interceptors could result in oil polluted discharges entering local watercourses.

Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

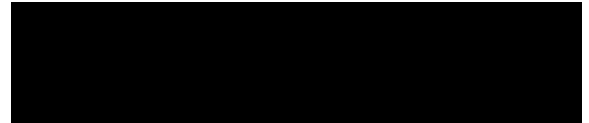
There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance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

The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide

'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

- 11 The landowners, managing operators and tenants are required to adhere to the actions of the Considerate Lighting Charter as set in the City of London Appendix A of the City of London Lighting Supplementary Planning Document 17/11/2022
- 12 The landowners, managing operators and tenants for the Museum are required to participate in and apply for membership of the City's Community Toilet Scheme.
- 13 Heathrow Airport advises the applicant that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib, if a tower crane.
- 14 London City Airport advises that the applicant should contact the CAA AROPS team regarding cranes, who will consult with the relevant aerodrome stakeholders.
- 15 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation.

Liam Hayes
Chairman of Aldgate Connect BID



October 2022

Amy Williams

Case officer
City of London Corporation
Guildhall

Letter of support for 65 Crutched Friars 22/00882/FULMAJ

Dear Amy,

I am writing on behalf of the Aldgate Connect BID to support Dominvs Group's planning application for the redevelopment of 65 Crutched Friars.

The challenge of the pandemic and subsequent world events has shown the importance of the City as an economic powerhouse. As representatives of Aldgate's businesses spearheading City-wide regenerative projects and funding programmes that support the local communities and sectors most at need, our objective is to provide added value to Aldgate, encouraging economic growth, adding vibrancy and wellbeing to the City.

We believe the approval of this planning application would significantly help this ambition. Our research shows that the office market has evolved because of the pandemic. The City must diversify its population and accommodation and provide a more inclusive cultural offer. The prospect of the proposal incorporating a cultural asset will increase visitor footfall amplified by the Tower of London and provide a solid USP for this south end of Aldgate which is in need an injection of life. The plethora of hotels in the vicinity would benefit from more local attractions for their visitors and the spillout of this will provide the local economy and footfall for small independents in this area to sustain them without full office occupancy. The student accommodation offer concept is not new in Aldgate but it is a market that does inject a vibrant and diverse talent to the City. Having students embedded into the City of London, provides skills and the next generation to feel that the City is not a foreign place to them when

they exit higher education. They are the new generation of workers, entering into the professional services, entrepreneurs or emerging markets that the City of London wants to promote. They are the blood line of the economy. Dominvs Group have specified 35% as affordable accommodation and in this way, this makes the development work for the City's more inclusive strategies.

Addressing local spend, the restaurants and services in the area may want to take advantage of the BID's *In the City App* that offers loyalty discounts and event promotion to all users in the City. It will encourage bars and restaurants to be more competitive, developing their character adding an extra value to this section of the City. Through research and noted behaviour patterns, we don't see spend being an issue particularly against the backdrop of the flexible workplace culture.

We see Aldgate as a genuinely diverse and mixed-use area with a range of offices, shops, homes and community facilities arranged round its unique street pattern and different types of buildings. We have worked with our members and the City of London Corporation to agree four strategic themes to protect this character and ensure any change in Aldgate is positive: we believe Dominvs Group's proposal for the 65 Crutched Friars site delivers on all of these themes.

The proposal will support our plans to create **an appealing area** through supporting ambitions and interventions in the new Aldgate Public Realm Vision and Strategy particularly the interventions around the Vine Street character area that is highlighted in our strategy. A finely designed building and softening of the surrounding public realm makes it a fundamental development in the south of Aldgate.

Another major project that is important through the strategy, is an improved streetscape and upgrades to the materiality of the highway. Between Boundary House and 65 Crutched Friars, the area will be significantly upgraded via S278 and can set a benchmark for all future projects.

65 Crutched Friars would support the goals of our strategy by providing a new green space in the courtyard off Northumberland Alley, as well as facilitating the possibility of a pocket park on Rangoon Street by relocating the service entrance to Carlisle Avenue.

We are discussing with Dominvs what post planning efforts can be made to underpin a more **protected, safer** area through the provision of additional security aspects. They have engaged with Publica who have launched a [campaign](#) to provide an action plan making the built environment more accountable providing safe spaces in response to tragic recent incidents against women and girls.

The introduction of new museum and community asset greatly aligns to the vision of the Aldgate BID and creates **a welcoming area** for residents, students, workers and visitors. The potential Migration Museum tenant, will bring new audiences into the City and, on top of this we believe this is a great fit for the heritage of the local area. Cultural sector jobs will be provided through the scheme and this is important to support. The museum will be supported by our loyalty based systems, digital media communication services and neighbourhood tours for hotels highlighting the local attractions while it builds up its exposure.

ALDGATE CONNECT

Welcome everyone

This is also a development that will make Aldgate *a stronger area*. By bringing more students into the area, careers and connections are made. The combination of the student offer and the third touristic attraction in the area (Whitechapel Gallery and Tower of London), cements the narrative of Aldgate and the City as an area that is diverse, young and full of talent. The proposal supports the stronger communities with the provision of a cultural/community use, which can help strengthen the community of the area and activate the street, both visually through active street fronts, all providing a more inclusive welcome.

It is worth noting at this stage, Dominvs Group and development team have been to all our steering groups to present and consult. They have demonstrated thoughtful, genuine engagement and used the Public Realm Vision and Strategy as a launchpad to mold their development and cultural strategy.

We hope that you are favourable to Dominvs Group's proposal.

Kind regards



Liam

Liam Hayes

Chair of the Aldgate Connect BID

A handwritten signature in black ink, appearing to be 'Liam Hayes', written over the typed name.

From: [REDACTED]
To: [REDACTED]
Subject: Planning Application at Friary Court 65
Date: 21 October 2022 20:57:49

THIS IS AN EXTERNAL EMAIL

Hello,

My fiance and I are residents at 1 Pepys Street and have been City of London residents for over 2 years, with both of us also working here. We have received the letter regarding an application to build a 20 floor student accommodation of 780 rooms at Friary Court 65.

We would like to both voice a strong objection to this plan. We think this would have a detrimental effect on the area's amenities and infrastructure. We would like to ephasize the following points:

- The area is already highly congested and noisy, especially on weekends, due to tourists and partygoers
- Tube stations at Aldgate and Tower Hill are very busy with commuters as it is
- With many businesses in the area already targeting drinkers, we are particularly concerned about crime (which from the news seems to already be on the rise)
- The availability of public green spaces is already at its limit, with Aldgate Square and Trinity Square gardens full on both weekends and weekdays
- There is a short supply of GP clinics in the area, with us having to travel to Borough or Tower Hamlets, as well as long waiting times

We are in favour of the City of London staying primarily a business area, with a slowly-expanding residential sector that can meet the needs of its residents. We do not think it should be a student area, and we do not think the size of the proposed development is appropriate.

Kind Regards,
Maxim Shport & Olivia Hall
1 Pepys Street, Flat 303, London, EC3N 2NU

Comments for Planning Application 22/00882/FULMAJ

Application Summary

Application Number: 22/00882/FULMAJ

Address: Friary Court 65 Crutched Friars London EC3N 2AE

Proposal: Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works.

Case Officer: Amy Williams

Customer Details

Name: Mr Caleb Meath

Address: Flat 202, 1 Pepys Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment:As a local resident, I would like to express my strongest possible support for this development. Given the city's current makeup it is understandable that the neighbourhood is mainly dominated by businesses that cater to the Monday-Friday crowd. Unfortunately, this leaves shops and other amenities often closed on weekends. Increasing the number of local residents and cultural spaces will help increase the viability of businesses to stay open over the weekend making it easier to stay local. I also think that given the extreme cost of living crisis, housing/renter crisis, and potential recession that we are facing in London it is vital that when opportunities arise to boost the economy and increase housing supply they are taken.

From: [REDACTED]
To: [REDACTED]
Subject: Fwd: 22/00882/FULMAJ
Date: 24 October 2022 13:07:31

From: Paul Pavlou **Date:** 22 October 2022 at 06:33:05 BST
To: [REDACTED]
Subject: RE: 22/00882/FULMAJ

Dear Ms Williams

RE: [22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | [Friary Court 65 Crutched Friars London EC3N 2AE](#)

I am on the Board of Pepys Street RTM Company Limited and this letter sets out my view and the view of the Board representing residents and leaseholders of 1 Pepys Street.

Rationale for objection includes the following:

1. **sound pollution**, which is a problem for Tower Ward.
Increasing the population in the immediate vicinity by housing 780 students will make it intolerable. Students who are housed in nearby halls already frequent the bars in Tower. Every shout, scream and jeer is heard and amplified because of the tall buildings huddled together in the vicinity. Car engines and doors being slammed are heard also. Uber rides and Deliveroo deliveries will increase in huge numbers resulting in Tower becoming an incredibly noisy corner of the City. This will impact local residents,

businesses and tourists.

2. **litter** – after an inspection of other nearby student housing developments, bottles, cigarette butts, sweet wrappers, takeaway boxes and vomit was witnessed. Student housing will therefore lead to massive and rapid degeneration of this small Ward. This will detract local businesses from moving into Tower and also business travellers and tourists from staying here.
3. **Repurposing** - Tower Ward and its conservation area has for centuries been established as a centre for insurance business and commerce. The world's finest hotels choose Tower as their location because of the delicate balance Tower Ward maintains in its number of residents, tourists, business travellers and city workers. 780 students will outnumber the current residents. The sheer number of students will entice pubs and bars to cater for student lifestyle. This development will transform the character of this historic quarter of the City irreversibly.
4. **Destination City** – the repurposing of Tower and the negative effects such change will bring is at stark odds with the Corporation's Destination City vision. The resulting degeneration this change will bring will dissuade visitors from Tower, so having the opposite effect that Destination City was seeking to achieve.
5. **Council Tax** - students do not pay council tax which is required for keeping vital local services going. This proposal, if approved, would result in the largest demographic in the Ward being exempt from contributing to vital local services, putting disproportionate burden and strain on the small permanent resident minority.
6. **Architectural Interest** – Friary Court, which the applicant proposes to demolish, has special architectural interest and it is valued and admired by local residents who view it as a landmark that defines Crutched Friars and its historical and cultural links to the insurance industry of the City of London. Demolishing it in place for a plain looking structure will radically change the look and feel of Crutched Friars which local residents, tourists, business workers and, indeed, film production companies enjoy.
7. **Climate Change** - the demolition of Friary Court will contribute towards climate change. More recently the government has agreed with engineers who advise that replacing buildings was bad for the climate due to emissions being created from the manufacturing of steel,

cement, brick, glass, aluminium, and plastics. Demolishing and rebuilding creates double the emissions by necessitating the manufacture of two lots of construction materials.

8. **Works Disruption** – The demolition of an unblemished structure and its redevelopment will result in massive disruption during the works period. The noise created from the demolition and the ensuing build such as pile driving, lorries arriving and leaving, hammering and shouting will have a negative effect on the mental and physical health of local residents; all for a development they are against.

I urge the Committee to reject this application in its entirety.

Yours sincerely

Paul Pavlou

Comments for Planning Application 22/00882/FULMAJ

Application Summary

Application Number: 22/00882/FULMAJ

Address: Friary Court 65 Crutched Friars London EC3N 2AE

Proposal: Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works.

Case Officer: Amy Williams

Customer Details

Name: Mr Cort Malmberg

Address: Flat 6, 15 Trinity Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: This particular area of the City is in desperate need of re-development. Non-prime commercial office blocks dominate, most from the 1980s and most which appear to either be fully or mostly vacant. The proliferation of these vacant empty spaces, likely to only become worse following the general move towards flexible working, has a negative effect upon the general area. Businesses that once operated and thrived are closing at ever increasing numbers. Lack of footfall has also meant more anti-social behavior such as increased graffiti and public urination. Although I live on Trinity Square, only a few minutes away, I cannot say that I'm particularly comfortable walking on Crutched Friars after dark. A student accommodation would inject some much needed vitality and life into this area and would almost certainly bring additional businesses that would benefit the local residents and neighbors. I am hopeful that this proposal will be approved given this particular pocket of the City feels like it has been left behind.

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: OBJECTION 22/00882/FULMAJ Friary Court 65 Crutched Friars London EC3N 2AE
Date: 23 October 2022 22:01:08

THIS IS AN EXTERNAL EMAIL

To the City of London Planning Committee

With horror and dismay, I have discovered the plans to build a 20-storey student accommodation tower outside of my windows. I would like to object in the strongest possible terms.

I own a north-facing apartment at the top of the 8-storey residential building at 1 Pepys St, looking directly across the Fenchurch St Station viaduct to the plot in question at 65 Crutched Friars. Our building of 90 flats is the most significant residential building within this extraordinarily tranquil neighbourhood, largely comprising office space. We enjoy a peaceful evening and weekend oasis within the City of London. It is a major reason to live here.

Somewhat peculiarly, the planning documentation supplied for the proposed construction of a massive new building to house students, has ignored our own building in many of its maps, such as the Noise Planning Report and the Sunlight reports - when ours is a nearby residential building that will be very heavily impacted. At the moment I look out over and above 65 Crutched Friars with unobstructed views into the distance. From the plans, I estimate that the proposed development will completely block 45 degrees or more than one-quarter of my roughly 160-degree skyline. In the planning documentation drawings I am yet to find an artist's impression that shows the very top, because it is simply just so incredibly tall. Instead of open space I will be faced with a gigantic tower full of almost 800 student apartments, many of them overlooking mine and other people's rooms within my building, noise blaring out from the individual student premises and a selection of open roof terraces. Surely this cannot be allowed? Where are the noise reports for our building and especially the evening/nighttime impact? I see none. Where are the light measurements? Likewise there is nothing. This appears a dereliction of duty by the developers.

Within London you must expect some building and new developments, but not those that entirely re-engineer and transform neighbourhoods in one fell swoop. The proposed building would not be a new addition to our neighbourhood; it would dramatically redefine it, sweeping all else away and turning us into a student quarter. It would be a betrayal of existing City residents.

If, for some reason, student accommodation must be built across the viaduct from us, then it would ideally be restricted to the current 5-storey level, along with the neighbouring buildings of Crutched Friars in this direction. That could be an acceptable compromise, diversifying the neighbourhood through evolution and not a dramatic revolution. It would be extremely disappointing were it to rise any higher.

Head anywhere further east from Tower Ward into the student areas of Whitechapel and signs of drug taking and antisocial behaviour are everywhere, for instance the streets littered with the silver nitrous oxide cartridges and associated carnage from groups of youths partying, the air thick with cannabis. We have kept our neighbourhood thankfully free of this, but the plan for so many student residences represents a tsunami that will engulf us. Of course not all students behave in such a way, but it would be disingenuous to suggest none or very few do, and when

the proposed building will house nearly a thousand, this will be the inevitable consequence.

It was one of the happiest moments of my life when I was able to move to the City of London and take up residency here. I never dreamt I would effectively be forced to live within a student neighbourhood. I urge the Planning Committee not to allow this to come about.

So far, my objection has been about what would be the finished building in the dreadful event it would come about. However, the disruption and noise when creating the site, from demolition to construction, is unfathomable. Is any action being proposed by the developers to rehouse residents within the City while their plan is ongoing? Surely any approval (which I insist would be wrongly given) must be contingent on this happening?

Yours faithfully

Keith Mansfield

PS Please redact my contact details from this objection if it is to be posted publicly.

PPS I have been given two different email addresses to send comments on the application to. Given the devastating impact the development would have on my life, I can't risk the objection not being received, so I am sending to both addresses. Apologies for any inconvenience.

Keith Mansfield

Flat 801

1 Pepys St

London EC3N 2NU



Comments for Planning Application 22/00882/FULMAJ

Application Summary

Application Number: 22/00882/FULMAJ

Address: Friary Court 65 Crutched Friars London EC3N 2AE

Proposal: Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works.

Case Officer: Amy Williams

Customer Details

Name: Mr Mark Henwood

Address: Flat 6 15 Trinity Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment:As a resident of the immediate area I strongly support the re-development of dated non-prime commercial space such as this building. The City as a whole is seeking to evolve into a mixed use area, and EC3N in particular is burdened with a legacy of dated buildings which are increasingly empty of workers now visibly leading to the disappearance of the few leisure/retail facilities that used to support them. A student population should help to support the remaining businesses and bring much needed diversity to the area.

Letter of Objection - Noise and Disturbance, Traffic Implications

[22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | Friary Court 65 Crutched Friars London EC3N 2AE

Dear Sir/Madam,

It is with great distress that we have reviewed this application to build a 780+ capacity student accommodation in the heart of Tower ward.

Whilst we find the current noise level just about tolerable in the evenings and overnight, we are extremely concerned that the additional noise caused by 780+ students and their requirements would prevent us from quietly enjoying our home. Two of the students' three "key travel journeys" and their access to two of the three "green spaces" mentioned in this application go directly past our home on 1 Pepys Street, and groups of students travelling (particularly late at night) will likely be disruptive and increase the amount of litter on the pavements. At the weekend, we are fairly regularly woken up by shouting from inebriated patrons of the Munich Cricket Club and surrounding establishments, and those en route to Fenchurch Street Station and Tower Hill Station. Students' routines are very different to those of the other residents who currently live in the area, and we are extremely concerned that we will have to deal with this kind of disruption on a daily basis. This application includes no information about additional trips made by the students at night, but if the additional 1,000+ trips in the day cited are anything to go off, it would likely be a lot.

Numerous rooftop spaces which face towards our home are included in the building design. Students congregating in these open area will likely create noise. Given the planned height of the building there would be nothing to muffle the noise before it reaches our home and this would be particularly disruptive overnight.

The students will move in and out of the accommodation multiple times per year. We understand from this application that 390+ students are expected to arrive by car in a short timeframe, resulting in extreme congestion in an area with narrow streets and the suspension of parking otherwise available to the local community has been proposed. We also understand that 25+ "principal" deliveries would be needed to the accommodation each day resulting in more HGVs and similar traversing the narrow streets of our ward increasing pollution of every kind and causing even more congestion.

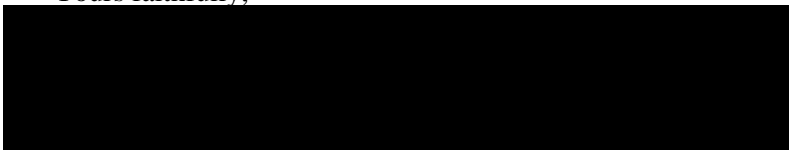
As a young couple, we moved to Tower ward to build our life in a global business centre with a carefully balanced numbers of residents, businesses, and tourists. We have bought into the corporation's vision for the City to be the place for business opportunity and a destination for tourism, and this application couldn't be further from that. There are already two student accommodation buildings with c. 1,600 beds on the fringe of Tower ward and this application would risk turning our local area into a student quarter, with social infrastructure principally targeted at students' needs. Although we acknowledge that investment post-covid is required, this is wrong type. Attracting new companies into a refurbished office building or a business hotel would encourage the opening of restaurants and return of the shops targeted at businesses which closed during the pandemic and would increase our quality of life.

We understand that the current residential population of Tower ward is c. 350 people. Introducing 780+ students would triple the population, render students the largest demographic and place undue pressure on local services. It is often already difficult to get a GP appointment or to find common groceries in the handful of small supermarkets in the ward, and it feels like this would become impossible if three

times as many people were trying to do so. There are limited “green spaces” in the ward and we fear they would become extremely crowded and littered.

This application details how the students will be protected from the local community but gives no thought to how the local community will be protected from the impact of the students. We and our neighbours were shocked to learn of the developer’s plans only a few weeks before this application was submitted. Being open-minded, we visited a couple of the new, high-end student developments in Aldgate and were upset at what we found there; empty alcohol containers and other litter all over the streets, urine and vomit stains on the pavements and walls, and groups of students noisily drinking in large groups. It would be simply devastating to see our ward and home become like this, and it is not what we had understood the City to be about when we moved here.

Yours faithfully,



Flat 705, 1 Pepys St, London, EC3N 2NU

Letter of Objection - Noise and Disturbance, Traffic Implications

[22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | Friary Court 65 Crutched Friars London EC3N 2AE

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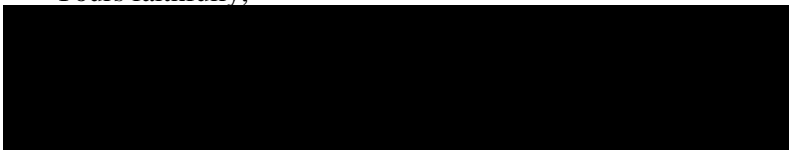
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Yours faithfully,



Flat 705, 1 Pepys St, London, EC3N 2NU

Comments for Planning Application 22/00882/FULMAJ

Application Summary

Application Number: 22/00882/FULMAJ

Address: Friary Court 65 Crutched Friars London EC3N 2AE

Proposal: Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works.

Case Officer: Amy Williams

Customer Details

Name: Dr Jayne Evans

Address: Flat 4 26 Savage Gardens LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I object to this application. 780 new residents would be a disaster for our area. There is just not enough space. There are not enough infra structure, (public transport, GP services, pavement and road space or green space, community spaces, proper shops).

If there were an emergency on CF or surrounding area, emergency services could not get through (the road is already tiny and cramped).

The effect if such a large increase in residents would mean that the area would become even more dirty. The area near my home (on Savage Gardens) is already on the Corporation's hot spot list for litter, unsanitary pavements etc. Adding more residents will make this worse.

Before adding to the residential population, the Corporation needs to provide the following: a low cost supermarket for residents (a coop mini store is not sufficient, I can't do a weekly shop there)! New premises for a GP surgery, the pressure on our only GP surgery is already at breaking point. Money and services to ensure the streets are not covered in litter, human waste, cigarette butts etc. A decent public transport system serving this area (since lockdown our buses have been cut

drastically and you need to lobby the government to get this sorted). Green spaces which everyone can use and which are diverse and support wildlife. A community space for all residents and local workers. An assurance that local residents and workers in the area are provided with businesses which serve them not just the needs of a student population (see my point above re GPs, supermarkets, community and green spaces).

Comments for Planning Application 22/00882/FULMAJ

Application Summary

Application Number: 22/00882/FULMAJ

Address: Friary Court 65 Crutched Friars London EC3N 2AE

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Case Officer: Amy Williams

Customer Details

Name: Miss Gaelle Yamdjeu Tiabo

Address: 1 Pepys Street Flat 603 London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Traffic or Highways

Comment: I object to the demolition of the existing building and building of a new one

Comments for Planning Application 22/00882/FULMAJ

Application Summary

Application Number: 22/00882/FULMAJ

Address: Friary Court 65 Crutched Friars London EC3N 2AE

Proposal: Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works.

Case Officer: Amy Williams

Customer Details

Name: Mr Ivan Morozov

Address: Flat 607 1 Pepys street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Traffic or Highways

Comment: Hello, I would like to object the proposal on the grounds on the new premises changing the nature of the area from the business district to the student area. I am also concerned about the increased level of both foot and car traffic in particular on the moving in and out days as well as the level of noise and littering from the neighbouring premises such as Munich Cricket Club.

Begum, Shupi

From: Alan Perrin [REDACTED]
Sent: 26 October 2022 11:10
To: PLN - Comments
Subject: Objection To Planning Application - 22/00882/FULMAJ |

THIS IS AN EXTERNAL EMAIL

Dear Sir, Madam,

Ref: [22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms).

I urge the Committee to reject this application in its entirety. The rationale for objection includes the following:

1. **Sound pollution**, which is a problem for Tower Ward. Increasing the population in the immediate vicinity by housing 780 students will make it intolerable. Students who are housed in nearby halls already frequent the bars in Tower. Every shout, scream and jeer is heard and amplified because of the tall buildings huddled together in the vicinity. Car engines and doors being slammed are heard also. Uber rides and Deliveroo deliveries will increase in huge numbers resulting in Tower becoming an incredibly noisy corner of the City. This will impact local residents, businesses and tourists.
2. **Litter** – after reports of an inspection of other nearby student housing developments by the Pepys Street RTM Company Limited board, bottles, cigarette butts, sweet wrappers, takeaway boxes and vomit was witnessed. Student housing will therefore lead to massive and rapid degeneration of this small Ward. This will detract local businesses from moving into Tower and also business travellers and tourists from staying here.
3. **Repurposing** - Tower Ward and its conservation area has for centuries been established as a centre for insurance business and commerce. The world's finest hotels choose Tower as their location because of the delicate balance Tower Ward maintains in its number of residents, tourists, business travellers and city workers. 780 students will outnumber the current residents. The sheer number of students will entice pubs and bars to cater for student lifestyle. This development will transform the character of this historic quarter of the City irreversibly.
4. **Destination City** – the repurposing of Tower and the negative effects such change will bring is at stark odds with the Corporation's Destination City vision. The resulting degeneration this change will bring will dissuade visitors from Tower, so having the opposite effect that Destination City was seeking to achieve.
5. **Council Tax** - students do not pay council tax which is required for keeping vital local services going. This proposal, if approved, would result in the largest demographic in the Ward being exempt from contributing to vital local services, putting disproportionate burden and strain on the small permanent resident minority.
6. **Architectural Interest** – Friary Court, which the applicant proposes to demolish, has special architectural interest and it is valued and admired by local residents who view it as a landmark that defines Crutched Friars and its historical and cultural links to the insurance industry of the City of London. Demolishing it in place for a plain looking structure will radically change the look and feel of Crutched Friars which local residents, tourists, business workers and, indeed, film production companies enjoy.

7. **Climate Change** - the demolition of Friary Court will contribute towards climate change. More recently the government has agreed with engineers who advise that replacing buildings was bad for the climate due to emissions being created from the manufacturing of steel, cement, brick, glass, aluminium, and plastics. Demolishing and rebuilding creates double the emissions by necessitating the manufacture of two lots of construction materials.
8. **Works Disruption** – The demolition of an unblemished structure and its redevelopment will result in massive disruption during the works period. The noise created from the demolition and the ensuing build such as pile driving, lorries arriving and leaving, hammering and shouting will have a negative effect on the mental and physical health of local residents; all for a development they are against.

Yours sincerely,

Alan Perrin

Owner – Flat 503
1 Pepys Street
EC3N 2NU

Sent from [Mail](#) for Windows

Begum, Shupi

From: Gilles Leroy <[REDACTED]>
Sent: 26 October 2022 13:54
To: PLN - Comments
Subject: OBJECTION RE: 22/00882/FULMAJ

THIS IS AN EXTERNAL EMAIL

Dear Committee Members

OBJECTION RE: [22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | [Friary Court 65 Crutched Friars London EC3N 2AE](#)

Rationale for objection includes the following:

1. **sound pollution**, which is a problem for Tower Ward. Increasing the population in the immediate vicinity by housing 780 students will make it intolerable. Students who are housed in nearby halls already frequent the bars in Tower. Every shout, scream and jeer is heard and amplified because of the tall buildings huddled together in the vicinity. Car engines and doors being slammed are heard also. Uber rides and Deliveroo deliveries will increase in huge numbers resulting in Tower becoming an incredibly noisy corner of the City. This will impact local residents, businesses and tourists.
2. **litter** – after reports of an inspection of other nearby student housing developments by the Pepys Street RTM Company Limited board , bottles, cigarette butts, sweet wrappers, takeaway boxes and vomit was witnessed. Student housing will therefore lead to massive and rapid degeneration of this small Ward. This will detract local businesses from moving into Tower and also business travellers and tourists from staying here.
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4. **Destination City** – the repurposing of Tower and the negative effects such change will bring is at stark odds with the Corporation’s Destination City vision. The resulting degeneration this change will bring will dissuade visitors from Tower, so having the opposite effect that Destination City was seeking to achieve.

5. **Council Tax** - students do not pay council tax which is required for keeping vital local services going. This proposal, if approved, would result in the largest demographic in the Ward being exempt from contributing to vital local services, putting disproportionate burden and strain on the small permanent resident minority.
6. **Architectural Interest** – Friary Court, which the applicant proposes to demolish, has special architectural interest and it is valued and admired by local residents who view it as a landmark that defines Crutched Friars and its historical and cultural links to the insurance industry of the City of London. Demolishing it in place for a plain looking structure will radically change the look and feel of Crutched Friars which local residents, tourists, business workers and, indeed, film production companies enjoy.
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I urge the Committee to reject this application in its entirety.

Yours sincerely

Giles Leroy

1 Pepys Street
EC3N 2NU

From: 
To: 
Cc: 
Subject: OBJECTION RE: 22/00882/FULMAJ
Date: 26 October 2022 10:15:18

THIS IS AN EXTERNAL EMAIL

Dear Committee Members,

OBJECTION RE: 22/00882/FULMAJ | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | Friary Court 65 Crutched Friars London EC3N 2AE

Rationale for objection includes the following:

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I urge the Committee to reject this application in its entirety.

Yours sincerely

Giordano Suergiu

Flat 511
1 Pepys Street
EC3N 2NU

From: 
To: 
Subject: OBJECTION RE: 22/00882/FULMAJ
Date: 26 October 2022 10:03:05

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Dear Committee Members

OBJECTION RE: 22/00882/FULMAJ | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis) (+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | Friary Court 65 Crutched Friars London EC3N 2AE

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6. **Architectural Interest** – Friary Court, which the applicant proposes to demolish, has special architectural interest and it is valued and admired by local residents who view it as a landmark that defines Crutched Friars and its historical and cultural links to the insurance industry of the City of London. Demolishing it in place for a plain looking structure will radically change the look and feel of Crutched Friars which local residents, tourists, business workers and, indeed, film production companies enjoy.

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8. **Works Disruption** – The demolition of an unblemished structure and its redevelopment will result in massive disruption during the works period. The noise created from the demolition and the ensuing build such as pile driving, lorries arriving and leaving, hammering and shouting will have a negative effect on the mental and physical health of local residents; all for a development they are against.

I urge the Committee to reject this application in its entirety.

Yours sincerely

Graeme Smith
Leasholder, Flat 609, 1 Pepys Street
EC3N 2NU

Graeme Smith



Begum, Shupi

From: James O'Doherty [REDACTED]
Sent: 26 October 2022 10:43
To: PLN - Comments
Subject: OBJECTION RE: 22/00882/FULMAJ

THIS IS AN EXTERNAL EMAIL

Dear Committee Members

OBJECTION RE: 22/00882/FULMAJ | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | [Friary Court 65 Crutched Friars London EC3N 2AE](#)

Rationale for objection includes the following:

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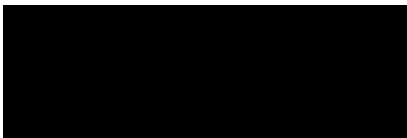
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I urge the Committee to reject this application in its entirety.

Yours sincerely

1 Pepys Street
EC3N 2NU

James O'Doherty
Solution and Database Architect



31 Leconfield Road
Highbury
London N5 2RZ



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Begum, Shupi

From: Tizi [REDACTED]
Sent: 26 October 2022 13:52
To: PLN - Comments
Subject: OBJECTION RE: 22/00882/FULMAJ

THIS IS AN EXTERNAL EMAIL

Dear Committee Members

OBJECTION RE: 22/00882/FULMAJ | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | Friary Court 65 Crutched Friars London EC3N 2AE

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I urge the Committee to reject this application in its entirety.

Yours sincerely

Tiziana Salta

1 Pepys Street
EC3N 2NU

From: [REDACTED]
Sent: 26 October 2022 14:48
To: PLN - Comments
Subject: OBJECTION RE: 22/00882/FULMAJ

THIS IS AN EXTERNAL EMAIL

Dear Committee Members

OBJECTION RE: [22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | [Friary Court 65 Crutched Friars London EC3N 2AE](#)

Rationale for objection includes the following:

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I urge the Committee to reject this application in its entirety.

Yours sincerely

Flat 310
UNIBOSS LTD
1 Pepys Street
EC3N 2NU

Comments for Planning Application 22/00882/FULMAJ

Application Summary

Application Number: 22/00882/FULMAJ

Address: Friary Court 65 Crutched Friars London EC3N 2AE

Proposal: Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works.

Case Officer: Amy Williams

Customer Details

Name: Mr Calum Clow

Address: Flat 804, 1 Pepys Street, London EC3N 2NU

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:RE: 22/00882/FULMAJ | Friary Court 65 Crutched Friars London EC3N 2AE

I am resident at Apt. No. 804, 1 Pepys Street, Tower Hill, EC3N 2NU.

I join with my fellow residents in objecting strongly to the proposed development listed above. I must reiterate the objections made by my fellow tenants, based on all the points below....

Rationale for objection includes the following:

sound pollution, which is a problem for Tower Ward. Increasing the population in the immediate vicinity by housing 780 students will make it intolerable. Students who are housed in nearby halls already frequent the bars in Tower. Every shout, scream and jeer is heard and amplified because of the tall buildings huddled together in the vicinity. Car engines and doors being slammed are heard also. Uber rides and Deliveroo deliveries will increase in huge numbers resulting in Tower becoming an incredibly noisy corner of the City. This will impact local residents, businesses and

tourists.

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Destination City - the repurposing of Tower and the negative effects such change will br

From: [REDACTED]
Sent: 26 October 2022 13:20
To: PLN - Comments
Subject: OBJECTION RE: 22/00882/FULMAJ

THIS IS AN EXTERNAL EMAIL

Dear Committee Members

OBJECTION RE: [22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | [Friary Court 65 Crutched Friars London EC3N 2AE](#)

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We urge the Committee to reject this application in its entirety.

Yours sincerely

Mrs H Mason and Rev C O Mason

Leaseholders of Flat 111

1 Pepys Street

London EC3N 2NU

Flat 2, 25 Savage Gardens, London, EC3N 2AR
07881 780678

Planning Department
Corporation of The City of London
The Guildhall
P O Box 270
London EC2P 2EJ

26th October 2022

Subject: Planning application 22/00882/FULMAJ

The subject application gives cause for considerable concern by residents as under. The location lies not only in a Conservation Area but also an area of very considerable historical and cultural interest.

1. Sound pollution will be an issue during construction and after completion; particularly between 1800-2400 hrs. and probably longer. It will also intrude on the peaceful nature of the area at weekends.
2. Light pollution will blight the area as in item 1 above.
3. There is already a litter issue which can only be made worse by having a large number of transient dwellers who have no affinity to the area.
4. My understanding is that students and their accommodation receive extremely favourable Council Tax treatment in that such taxes are minimal if any. Surely this is unfair to those who live in close proximity and pay normal council taxes.
5. The proposed construction is a few meters from Trinity House (Grade 1 - built 1796; re-constructed post 1946) and Trinity Square. The square is home to one of the most important World War 1 and 11 memorials. Namely to the 36,070 Merchant Navy and Fishing Fleet personnel who gave their lives defending Britain. I have a relative recorded there. This special area is already under constant threat from visitors to The Tower of London & Tower Bridge in terms of litter and sometimes drunken/inappropriate behaviour. IT MUST BE PROTECTED AT ALL TIMES REGARDLESS OF COST.
6. Residents of the immediate area already suffer from regrettable behaviour from visitors and those coming out of the local bars and public houses. There is frequently broken glass on the pavements; foul and abusive language is heard; people vomit on the pavements and roads. The presence of several hundred students may make matters worse. Given that the proposal is for student accommodation I would suggest that any approval requires that there NO ALCOHOL be sold or served on the premises.

In conclusion one asks why such a special area is in any way suitable for mass student use? If this application were to receive approval the Corporation must brace themselves for issues relating to the concerns aforementioned.

Yours faithfully


Mr R N G Robinson

From: David Walsh [REDACTED]
Sent: 27 October 2022 10:15
To: PLN - Comments
Subject: OBJECTION RE: 22/00882/FULMAJ

THIS IS AN EXTERNAL EMAIL

Dear Committee Members

OBJECTION RE: [22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | [Friary Court 65 Crutched Friars London EC3N 2AE](#)

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I urge the Committee to reject this application in its entirety.

Yours sincerely

David Walsh
Apartment 103
1 Pepys Street
EC3N 2NU

Begum, Shupi

From: Kurt van der Linde [REDACTED]
Sent: 27 October 2022 10:10
To: PLN - Comments
Subject: OBJECTION RE: 22/00882/FULMAJ

THIS IS AN EXTERNAL EMAIL

Dear Committee Members,

We are a serviced apartment company that has been operating at 1 Pepys Street, EC3N 2NU for the last 10 years - the proposed development is going to have a direct negative impact on our business as per the reasons below.

OBJECTION RE: [22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | [Friary Court 65 Crutched Friars London EC3N 2AE](#)

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I urge the Committee to reject this application in its entirety.

Yours sincerely

Kurt van der Linde

1 Pepys Street

EC3N 2NU

Kurt van der Linde

Managing Director



Begum, Shupi

From: Mike Attwood [REDACTED]
Sent: 27 October 2022 11:14
To: PLN - Comments
Subject: OBJECTION RE: 22/00882/FULMAJ | Demolition of existing building and redevelopment of the site for a new building comprising basement

THIS IS AN EXTERNAL EMAIL

Dear Committee Members

As the owner of Flat 5, 25 Savage Gardens, EC3N 2AR, I object to the planning application above. You will have seen the comments of 1 Pepys Street.

They have analysed the concerns in respect of this planning application very thoroughly and I have nothing to add.

I therefore reproduced their comments below which have my full support.

Many thanks for your consideration,

Stephen Sutcliffe

OBJECTION RE: [22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | [Friary Court 65 Crutched Friars London EC3N 2AE](#)

Rationale for objection includes the following:

1. **sound pollution**, which is a problem for Tower Ward. Increasing the population in the immediate vicinity by housing 780 students will make it intolerable. Students who are housed in nearby halls already frequent the bars in Tower. Every shout, scream and jeer is heard and amplified because of the tall buildings huddled together in the vicinity. Car engines and doors being slammed are heard also. Uber rides and Deliveroo deliveries will increase in huge numbers resulting in Tower becoming an incredibly noisy corner of the City. This will impact local residents, businesses and tourists.
2. **litter** – after reports of an inspection of other nearby student housing developments by the Pepys Street RTM Company Limited board , bottles, cigarette butts, sweet wrappers, takeaway boxes and vomit was witnessed. Student housing will therefore lead to massive

and rapid degeneration of this small Ward. This will detract local businesses from moving into Tower and also business travellers and tourists from staying here.

3. **Repurposing** - Tower Ward and its conservation area has for centuries been established as a centre for insurance business and commerce. The world's finest hotels choose Tower as their location because of the delicate balance Tower Ward maintains in its number of residents, tourists, business travellers and city workers. 780 students will outnumber the current residents. The sheer number of students will entice pubs and bars to cater for student lifestyle. This development will transform the character of this historic quarter of the City irreversibly.
4. **Destination City** – the repurposing of Tower and the negative effects such change will bring is at stark odds with the Corporation's Destination City vision. The resulting degeneration this change will bring will dissuade visitors from Tower, so having the opposite effect that Destination City was seeking to achieve.
5. **Council Tax** - students do not pay council tax which is required for keeping vital local services going. This proposal, if approved, would result in the largest demographic in the Ward being exempt from contributing to vital local services, putting disproportionate burden and strain on the small permanent resident minority.
6. **Architectural Interest** – Friary Court, which the applicant proposes to demolish, has special architectural interest and it is valued and admired by local residents who view it as a landmark that defines Crutched Friars and its historical and cultural links to the insurance industry of the City of London. Demolishing it in place for a plain looking structure will radically change the look and feel of Crutched Friars which local residents, tourists, business workers and, indeed, film production companies enjoy.
7. **Climate Change** - the demolition of Friary Court will contribute towards climate change. More recently the government has agreed with engineers who advise that replacing buildings was bad for the climate due to emissions being created from the manufacturing of steel, cement, brick, glass, aluminium, and plastics. Demolishing and rebuilding creates double the emissions by necessitating the manufacture of two lots of construction materials.
8. **Works Disruption** – The demolition of an unblemished structure and its redevelopment will result in massive disruption during the works period. The noise created from the demolition and the ensuing build such as pile driving, lorries arriving and leaving, hammering and shouting will have a negative effect on the mental and physical health of local residents; all for a development they are against.

I urge the Committee to reject this application in its entirety.

Yours sincerely

Stephen Sutcliffe

Timothy Jordan
Flat 1
25 Savage Gardens
London EC3N 2AR

27 October 2022

City of London Planning Committee

Dear Committee Members,

OBJECTION RE: 22/00882/FULMAJ | Demolition of existing building and redevelopment of the site for a new building | Friary Court 65 Crutched Friars London EC3N 2AE

I have just become aware of the proposed development, and I would like to register my objection on the current application based on its negative impact to the area, and its existing residents.

Some of the factors I believe make the development in its current form untenable are as follows:

Significant increase in residents not contributing to Council Tax. I understand that the proposed development will introduce up to 780 students. This new in-flow will outnumber the permanent residents of the area. As students do not pay council tax, they will dilute the already minimal, but vital local services that exist for this small population of permanent residents. Services for residents already pale significantly compared to other nearby boroughs, such as Tower Hamlets, Hackney and Camden; which will be amplified by a large number of non-contributing residents. Whilst reports provided in the application downplay the strain on local services such as medical practices, the reality is that it is very difficult to secure an appointment with a GP as it is, and only gets worse over time.

Micro-environmental and antisocial behaviour factors reducing livability in the local area. The surrounding area is already subject to a number of concerns that are only increasing, and really affect the integrity of the area for residents. Litter, public urination, noise pollution from drunken patrons of local pubs/bars, vomit, blatant drug use (particularly cannabis and nitrous oxide); are already frustrating residents, and will be compounded by introducing a large number of students into an already busy area.

Works Disruption. The demolishment of an unblemished structure and its redevelopment will result in massive disruption during the works period. The noise and air pollution created from

the demolition and the ensuing build such as pile driving, lorries arriving and leaving, hammering and shouting will have a negative effect on the mental and physical health of local residents; all for a development they are against.

In short, I really do not want to live in "Student Central". I have experienced it before whilst working in Coventry for a couple of months, and it is awful. Would you subject your family to live in this type of environment? There have already been a large number of student accommodation developments built in the past couple of years in the City, Aldgate and Aldgate East. It really is getting out of control and should be subject to sensible and reasonable limits by the City Planning Committee.

Sincerely,

Timothy Jordan

PETITION TO THE CITY OF LONDON PLANNING AND TRANSPORTATION COMMITTEE

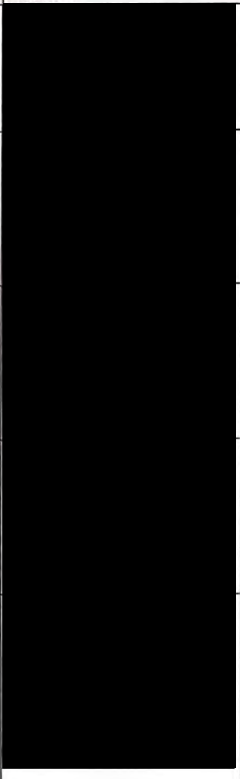

We, the undersigned, object to the application: 22/00882/FULMAJ | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | Friary Court 65 Crutched Friars London EC3N 2AE.

Our concerns regarding the above application include:

- increased pedestrian and motor traffic overnight throughout the week, exacerbating the noise pollution and littering already caused by patrons of the Munich Cricket Club and other similar establishments;
- extreme congestion on the days students move into and out of the accommodation each term, an estimated c. 390 students will arrive by car and there are proposal to suspend public parking;
- increased pressure on the local social infrastructure, more difficult to get doctor's appointments and overcrowding of green spaces such as Trinity Square Gardens; and
- changing the nature of the area from a business district to a student city, the student population would become the largest segment in the area and local businesses would be targeted at their needs rather than those of a business district and the local community.

We call on the City of London Planning and Transportation Committee to:

- reject the above application; and
- fully consult with local residents on any similar applications in the future.

	Name	Address & Postcode	Signature
1.		Flat... <i>G.D.S.</i> 1 Pepys Street, London, EC3N 2NU	
2.		Flat... <i>G.O.S.</i> 1 Pepys Street, London, EC3N 2NU	
3.		Flat... <i>S.O.4.</i> 1 Pepys Street, London, EC3N 2NU	
4.		Flat... <i>7.0.3</i> 1 Pepys Street, London, EC3N 2NU	
5.		Flat... <i>G.O.S.</i> 1 Pepys Street, London, EC3N 2NU	

PETITION TO THE CITY OF LONDON PLANNING AND TRANSPORTATION COMMITTEE

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We call on the City of London Planning and Transportation Committee to:

- reject the above application; and
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	Name	Address & Postcode	Signature
6.	[REDACTED]	Flat... <u>210</u> 1 Pepys Street, London, EC3N 2NU	[REDACTED]
7.	[REDACTED]	Flat... <u>409</u> 1 Pepys Street, London, EC3N 2NU	[REDACTED]
8.	[REDACTED]	Flat... <u>409</u> 1 Pepys Street, London, EC3N 2NU	[REDACTED]
9.	[REDACTED]	Flat... <u>207</u> 1 Pepys Street, London, EC3N 2NU	[REDACTED]
10.	[REDACTED]	Flat... <u>207</u> 1 Pepys Street, London, EC3N 2NU	[REDACTED]

PETITION TO THE CITY OF LONDON PLANNING AND TRANSPORTATION COMMITTEE

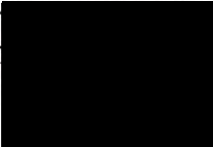
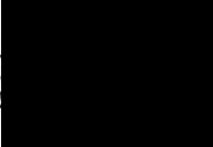
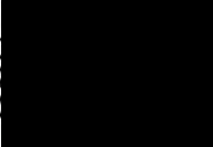
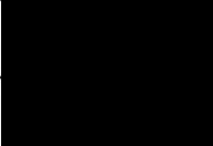

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Our concerns regarding the above application include:

- increased pedestrian and motor traffic overnight throughout the week, exacerbating the noise pollution and littering already caused by patrons of the Munich Cricket Club and other similar establishments;
- extreme congestion on the days students move into and out of the accommodation each term, an estimated c. 390 students will arrive by car and there are proposal to suspend public parking;
- increased pressure on the local social infrastructure, more difficult to get doctor's appointments and overcrowding of green spaces such as Trinity Square Gardens; and
- changing the nature of the area from a business district to a student city, the student population would become the largest segment in the area and local businesses would be targeted at their needs rather than those of a business district and the local community.

We call on the City of London Planning and Transportation Committee to:

- reject the above application; and
- fully consult with local residents on any similar applications in the future.

Name	Address & Postcode	Signature
11.	Flat..7..0.b. 1 Pepys Street, London, EC3N 2NU	
12.	Flat...11.0.1. 1 Pepys Street, London, EC3N 2NU	
13.	Flat..8.0.1. 1 Pepys Street, London, EC3N 2NU	
14.	Flat...0.2.... 1 Pepys Street, London, EC3N 2NU	
15.	Flat.....0.5 1 Pepys Street, London, EC3N 2NU	

PETITION TO THE CITY OF LONDON PLANNING AND TRANSPORTATION COMMITTEE

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	Name	Address & Postcode	Signature
16.		Flat.....208 1 Pepys Street, London, EC3N 2NU	
17.		Flat.....208 1 Pepys Street, London, EC3N 2NU	
18.		Flat.....208 1 Pepys Street, London, EC3N 2NU	
19.		Flat.....209 1 Pepys Street, London, EC3N 2NU	
20.		Flat.....202 1 Pepys Street, London, EC3N 2NU	

PETITION TO THE CITY OF LONDON PLANNING AND TRANSPORTATION COMMITTEE

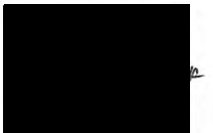

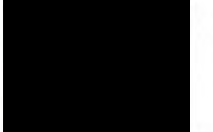
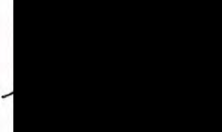
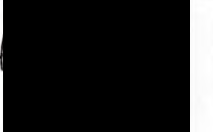
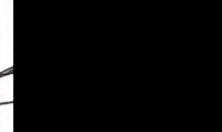
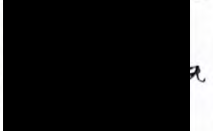
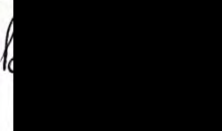
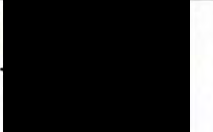
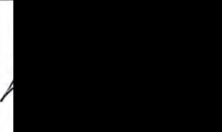
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Our concerns regarding the above application include:

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- extreme congestion on the days students move into and out of the accommodation each term, an estimated c. 390 students will arrive by car and there are proposal to suspend public parking;
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We call on the City of London Planning and Transportation Committee to:

- reject the above application; and
- fully consult with local residents on any similar applications in the future.

	Name	Address & Postcode	Signature
21.		Flat... <i>102</i> 1 Pepys Street, London, EC3N 2NU	
22.		Flat... <i>401</i> 1 Pepys Street, London, EC3N 2NU	
23.		Flat... <i>101</i> 1 Pepys Street, London, EC3N 2NU	
24.		Flat... <i>409</i> 1 Pepys Street, London, EC3N 2NU	
25.		Flat... <i>109</i> 1 Pepys Street, London, EC3N 2NU	

PETITION TO THE CITY OF LONDON PLANNING AND TRANSPORTATION COMMITTEE

We, the undersigned, object to the application: 22/00882/FULMAJ | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | Friary Court 65 Crutched Friars London EC3N 2AE.

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- increased pedestrian and motor traffic overnight throughout the week, exacerbating the noise pollution and littering already caused by patrons of the Munich Cricket Club and other similar establishments;
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We call on the City of London Planning and Transportation Committee to:

- reject the above application; and
- fully consult with local residents on any similar applications in the future.

	Name	Address & Postcode	Signature
26.	[REDACTED]	Flat.302... 1 Pepys Street, London, EC3N 2NU	[REDACTED]
27.	[REDACTED]	Flat...506 1 Pepys Street, London, EC3N 2NU	[REDACTED]
28.	[REDACTED]	Flat.305... 1 Pepys Street, London, EC3N 2NU	[REDACTED]
29.	[REDACTED]	Flat.....509, 1 Pepys Street, London, EC3N 2NU	[REDACTED]
30.	[REDACTED]	Flat..... 1 Pepys Street, London, EC3N 2NU	[REDACTED]

Begum, Shupi

From: Keith Mansfield [REDACTED]
Sent: 28 October 2022 13:12
To: PLN - Comments
Subject: Re: OBJECTION 22/00882/FULMAJ Friary Court 65 Crutched Friars London EC3N 2AE

THIS IS AN EXTERNAL EMAIL

Dear Amy

Thank you for the acknowledgement of my comments regarding the above planning application. I hope it is possible to ammend my observations, adding the following additional material in [blue](#), which you will see I have also added below in the hope you can use this as a revised single objection.

In addition, a unique characteristic of the City of London is the long-termism it engenders. The streets we walk today, with evocative names such as Crutched Friars, echo the centuries that have gone before. I was thrilled to be able to engage recently with the consultation over the City's flood defences, the plan put forward stretching nearly a century hence. Residents and Planners must all have the long-term future of this historic yet future-focused area at their heart. Enter a vast, transient residential population who would not even consider this their main present home, let alone their long-term one, and the entire nature of the population is skewed in a different way: from a deep concern for the area, to effectively no concern at all. Giving approval would be as if the City Planning Committee wanted to destroy the nature of this place from within.

Happily, I am given to understand that the proposal is not policy compliant because the area in question is designated for office use, so I trust and expect the Planning Committee will refuse permission.

I hope that's clear and you can simply lift the full text below. Let me know if it's not clear or if you have any questions.

Sincerely

Keith

From: Keith Mansfield [REDACTED]
Sent: Sunday, October 23, 2022 10:01 PM
To: [REDACTED]
Cc: Fredericks, Marianne [REDACTED]
Subject: OBJECTION 22/00882/FULMAJ Friary Court 65 Crutched Friars London EC3N 2AE

To the City of London Planning Committee

With horror and dismay, I have discovered the plans to build a 20-storey student accommodation tower outside of my windows. I would like to object in the strongest possible terms.

I own a north-facing apartment at the top of the 8-storey residential building at 1 Pepys St, looking directly across the Fenchurch St Station viaduct to the plot in question at 65 Crutched Friars. Our building of 90 flats is the most

significant residential building within this extraordinarily tranquil neighbourhood, largely comprising office space. We enjoy a peaceful evening and weekend oasis within the City of London. It is a major reason to live here.

Somewhat peculiarly, the planning documentation supplied for the proposed construction of a massive new building to house students, has ignored our own building in many of its maps, such as the Noise Planning Report and the Sunlight reports - when ours is a nearby residential building that will be very heavily impacted. At the moment I look out over and above 65 Crutched Friars with unobstructed views into the distance. From the plans, I estimate that the proposed development will completely block 45 degrees or more than one-quarter of my roughly 160-degree skyline. In the planning documentation drawings I am yet to find an artist's impression that shows the very top, because it is simply just so incredibly tall. Instead of open space I will be faced with a gigantic tower full of almost 800 student apartments, many of them overlooking mine and other people's rooms within my building, noise blaring out from the individual student premises and a selection of open roof terraces. Surely this cannot be allowed? Where are the noise reports for our building and especially the evening/nighttime impact? I see none. Where are the light measurements? Likewise there is nothing. This appears a dereliction of duty by the developers.

Within London you must expect some building and new developments, but not those that entirely re-engineer and transform neighbourhoods in one fell swoop. The proposed building would not be a new addition to our neighbourhood; it would dramatically redefine it, sweeping all else away and turning us into a student quarter. It would be a betrayal of existing City residents.

If, for some reason, student accommodation must be built across the viaduct from us, then it would ideally be restricted to the current 5-storey level, along with the neighbouring buildings of Crutched Friars in this direction. That could be an acceptable compromise, diversifying the neighbourhood through evolution and not a dramatic revolution. It would be extremely disappointing were it to rise any higher.

Head anywhere further east from Tower Ward into the student areas of Whitechapel and signs of drug taking and antisocial behaviour are everywhere, for instance the streets littered with the silver nitrous oxide cartridges and associated carnage from groups of youths partying, the air thick with cannabis. We have kept our neighbourhood thankfully free of this, but the plan for so many student residencies represents a tsunami that will engulf us. Of course not all students behave in such a way, but it would be disingenuous to suggest none or very few do, and when the proposed building will house nearly a thousand, this will be the inevitable consequence.

It was one of the happiest moments of my life when I was able to move to the City of London and take up residency here. I never dreamt I would effectively be forced to live within a student neighbourhood. I urge the Planning Committee not to allow this to come about.

In addition, a unique characteristic of the City of London is the long-termism it engenders. The streets we walk today, with evocative names such as Crutched Friars, echo the centuries that have gone before. I was thrilled to be able to engage recently with the consultation over the City's flood defences, the plan put forward stretching nearly a century hence. Residents and Planners must all have the long-term future of this historic yet future-focused area at their heart. Enter a vast, transient residential population who would not even consider this their main present home, let alone their long-term one, and the entire nature of the population is skewed in a different way: from a deep concern for the area, to effectively no concern at all. Giving approval would be as if the City Planning Committee wanted to destroy the nature of this place from within.

Happily, I am given to understand that the proposal is not policy compliant because the area in question is designated for office use, so I trust and expect the Planning Committee will refuse permission.

So far, my objection has been about what would be the finished building in the dreadful event it would come about. However, the disruption and noise when creating the site, from demolition to construction, is unfathomable. Is any action being proposed by the developers to rehouse residents within the City while their plan is ongoing? Surely any approval (which I insist would be wrongly given) must be contingent on this happening?

Yours faithfully

Keith Mansfield

PS Please redact my contact details from this objection if it is to be posted publicly.

PPS I have been given two different email addresses to send comments on the application to. Given the devastating impact the development would have on my life, I can't risk the objection not being received, so I am sending to both addresses. Apologies for any inconvenience.

Keith Mansfield

Flat 801

1 Pepys St

London EC3N 2NU



From: [REDACTED]
Sent: 30 October 2022 16:42
To: PLN - Comments
Subject: OBJECTION RE: 22/00882/FULMAJ

THIS IS AN EXTERNAL EMAIL

Dear Committee Members

OBJECTION RE: [22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 / sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | [Friary Court 65 Crutched Friars London EC3N 2AE](#)

Rationale for objection includes the following:

1. **sound pollution**, which is a problem for Tower Ward. Increasing the population in the immediate vicinity by housing 780 students will make it intolerable. Students who are housed in nearby halls already frequent the bars in Tower. Every shout, scream and jeer is heard and amplified because of the tall buildings huddled together in the vicinity. Car engines and doors being slammed are heard also. Uber rides and Deliveroo deliveries will increase in huge numbers resulting in Tower becoming an incredibly noisy corner of the City. This will impact local residents, businesses and tourists.
2. **litter** – after reports of an inspection of other nearby student housing developments by the Pepys Street RTM Company Limited board, bottles, cigarette butts, sweet wrappers, takeaway boxes and vomit was witnessed. Student housing will therefore lead to massive and rapid degeneration of this small Ward. This will detract local businesses from moving into Tower and also business travellers and tourists from staying here.
3. **Repurposing** - Tower Ward and its conservation area has for centuries been established as a centre for insurance business and commerce. The world's finest hotels choose Tower as their location because of the delicate balance Tower Ward maintains in its number of residents, tourists, business travellers and city workers. 780 students will outnumber the current residents. The sheer number of students will entice pubs and bars to cater for student lifestyle. This development will transform the character of this historic quarter of the City irreversibly.
4. **Destination City** – the repurposing of Tower and the negative effects such change will bring is at stark odds with the Corporation's Destination City vision. The resulting degeneration this change will bring will dissuade visitors from Tower, so having the opposite effect that Destination City was seeking to achieve.
5. **Council Tax** - students do not pay council tax which is required for keeping vital local services going. This proposal, if approved, would result in the largest demographic in the Ward being exempt from contributing to vital local services, putting disproportionate burden and strain on the small permanent resident minority.
6. **Architectural Interest** – Friary Court, which the applicant proposes to demolish, has special architectural interest and it is valued and admired by local residents who view it as a landmark that defines Crutched Friars and its historical and cultural links to the insurance industry of the City of London. Demolishing it in place for a plain looking structure will radically change the look and feel

of Crutched Friars which local residents, tourists, business workers and, indeed, film production companies enjoy.

7. **Climate Change** - the demolition of Friary Court will contribute towards climate change. More recently the government has agreed with engineers who advise that replacing buildings was bad for the climate due to emissions being created from the manufacturing of steel, cement, brick, glass, aluminium, and plastics. Demolishing and rebuilding creates double the emissions by necessitating the manufacture of two lots of construction materials.
8. **Works Disruption** – The demolition of an unblemished structure and its redevelopment will result in massive disruption during the works period. The noise created from the demolition and the ensuing build such as pile driving, lorries arriving and leaving, hammering and shouting will have a negative effect on the mental and physical health of local residents; all for a development they are against.

I urge the Committee to reject this application in its entirety.

Yours sincerely

Adrian Taylor & Carol Hall
Flat A 26 Savage Gardens
London EC3N 2AR

Begum, Shupi

From: Jack Warren [REDACTED]
Sent: 01 November 2022 09:43
To: PLN - Comments
Subject: OBJECTION RE: 22/00882/FULMAJ

THIS IS AN EXTERNAL EMAIL

Jack Warren
Property Acquisitions Manager

PORTLAND BROWN
Your Global Provider of Corporate Accommodation



Portland Brown, Zetland House, Unit E, 5-25 Scrutton Street, London, EC2A 4HJ



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From: Paul Pavlou [REDACTED]
Sent: 24 October 2022 13:33
To: [REDACTED]
Subject: OBJECTION RE: 22/00882/FULMAJ

Dear Committee Members

OBJECTION RE: [22/00882/FULMAJ](#) | Demolition of existing building and redevelopment of the site for a new building comprising basement, ground plus 20 upper floors (+74.9m AOD) for purpose built student accommodation (780 rooms) and associated amenity space (Sui Generis); flexible cultural / community use at part ground, first and second floor levels (Use Class F1 / F2 /

sui generis)(+3101sqm GIA); hard and soft landscaping; ancillary plant and servicing; and associated works. | [Friary Court 65 Crutched Friars London EC3N 2AE](#)

Rationale for objection includes the following:

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I urge the Committee to reject this application in its entirety.

Yours sincerely

Jack Warren

1 Pepys Street
EC3N 2NU

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Amy Williams
City of London Corporation
Guildhall
EC2P 2EJ

Thursday, 01 December 2022

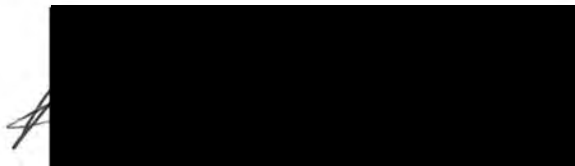
Dear Ms Williams,

65 Crutched Friars, London, EC3N 2AE - Planning Application

I write regarding Dominvs Group's planning application at 65 Crutched Friars (ref: 22/00882/FULMAJ). I can confirm that we have met with Dominvs as part of the public consultation, where they presented their proposals.

I would be grateful if you could please keep me informed of the application over the coming weeks.

Your sincerely,



Anthony Mellalieu MRICS
Development Director



Planning Department
City of London Corporation



December 15th 2022

Dear City Planning Administration,

**Re. Planning Application Consultation for Friary Court, 65 Crutched Friars, London EC3N 2AE:
22/00992/FULMAJ**

We are writing to object to the planning application which seeks to demolish the existing building at 65 Crutched Friars and the redevelopment of the site for a new 780-room student accommodation. Our objection is focused on the developer's, Dominvs', intent to change the use of Friary Court from office space to student accommodation.

Office accommodation is needed in the City. The Corporation has noted that the lack of office space is a justification for its proposals on the old Museum of London site, and we fail to understand how a proposal to lose office space is in keeping with the Corporations stated aims. This is why the Corporation is seeking to introduce more office space when the London Wall West site is regenerated after the Museum of London is rehoused.

Friary Court is in the area where many international insurance businesses and 5-star and 4-star hotels are based; and close to areas that already enjoy residential housing and student accommodation. Increasing student housing in an area which already has 1,000+ student rooms is not helpful to the area as student participation and economic activity is not the same as workers and residents, it would reduce interest in any further investment by hospitality, and leisure which supports workers and existing residents.

In addition, given that the developer intends to demolish the building at 65 Crutched Friars, which has been a landmark for local residents, there are sustainability and climate impacts to consider during both the demolition and rebuilding which are not wholly aligned with the City's Net-Zero Climate Action Strategy.

We also believe that this application for student housing does not contribute or fulfil the Corporation's 'Destination City' vision which focuses on tourism and leisure and attracting

workers, UK and international visitors to the Square Mile. The area is a beacon for tourism given its proximity to the Tower of London and Tower Bridge, which are visited by millions every year, this has justified the number of hotels in the ward, but is not helped with a change of use to student accommodation.

Furthermore, the developer, Dominvs, has no history in successfully developing student accommodation although it has secured planning consent for student housing within the last year (now in development), including 61-65 Holborn Viaduct, having successfully changed existing planning consent for hotel or residential developments to student accommodation, in some cases.

We stand alongside our business and residential community, who are predominately working professionals in the City or nearby, against yet more student accommodation being built in the area, especially at this scale. If this application is accepted, we expect this will lead to more viable office space being turned into student accommodation across the Square Mile.

Overview of Current Situation

Tower Ward

Tower Ward, where Friary Court, 65 Crutched Friars is situated, has been the established focal point for insurance firms in the Square Mile and is home to multinational corporations such as AIG, Zurich UK, Marsh and Thomas Miller. It is also the natural and main hub for business travel – domestic and international – with high-quality hotels that suits every traveller's need; it is where luxury 5-star hotels such as the Four Seasons Hotel at Ten Trinity Square and 4-star hotels including Double Tree Hilton, Leonardo, Novotel and Apex are based. Each hotel attracts high-calibre, high spending clientele and offers facilities which are suited for business custom and are used by firms situated in the area and their clients.

Existing Student Accommodation

There are five student accommodation buildings already located in Tower and neighbouring area. These buildings have upto 650 rooms with starting prices for a single, private room with shared kitchen and bathroom at 275 GBP per week / 1,200+ GBP per month. They are managed by different providers including Urbanest (Tower Bridge and City), IQ Student Accommodation, Unite Students and Chapter Living. At full capacity, they would house thousands of university students from universities across London.

Negative Impact on the Square Mile

Local businesses have contacted us to confirm that they are not supported by student customers and need more businesses workers to support the area. Our engagement with the student population already in the area confirms that they rarely use hospitality businesses (restaurants, bars etc.) in the vicinity of their accommodation and spend the majority of their time at university and student focus establishments away from the ward. There is real concern among local businesses / SMEs and us that if more student accommodation be approved, this will deter any multinationals from opening offices or existing businesses from expanding, preferring to move elsewhere. Additionally, if the application for yet more student accommodation is accepted, there is real concern that further applications for student accommodation on sites with potentially viable office space will be forthcoming across the Square Mile and not limited to just the “fringes” of the City and the Square Mile itself could slowly become a “Student City”.

Change of use for office space

The City of London Corporation has committed to meet the needs of the City of London as primary global business centre. The building at 65 Crutched Friars very much is part of that offering. The Corporation is showing confidence that demand for office space will increase in the coming years, most notably demonstrated by the Corporation’s proposed plans for London Wall West, which seeks to deliver approximately c. 40,000m² of office space. It is strange

The Corporation’s ‘Destination City’ agenda has fuelled confidence in the existing leisure and hospitality businesses based the City; our hotels are contributing to the first event on 15 October. Student housing developments are likely to cause similar businesses with no footprint in the City who are considering making the area their home, to look elsewhere.

The market analysis states that if 65 Crutched Friars was situated closer to Liverpool Street station, the building would be more viable given the opening of the Elizabeth Line. However, 65 Crutched Friars is c. 8-10 min walk from Liverpool Stret station and is a short walk 1-2 min walk from Tower Hill underground station (District and Circle Lines) and Tower Gateway DLR station and Fenchurch Street national rail station. It is also a commutable distance from London Bridge

station. We agree that the amenities and offerings can be enhanced, but this will be more unlikely to happen should more student housing be built.

Other Considerations

Cultural Offer

The cultural offer that the developer proposes is welcome and it is illustrative of business and wider cultural interest and intent that the Migration Museum believes it can benefit from being based in the area. However, we believe can easily be incorporated in a refurbishment / redevelopment of the building and is perhaps better suited to being part of an office development than one with student housing.

Students are not Residents

There is a misconception that the students will be quasi long-term residents in the area and will therefore be invested and form community in the area. Current experience with the students at the 600+ room student housing on Vine Street tells the opposite story. Student accommodation contracts from such providers are normally for one-year-terms (September-July) and students will generally spend their holidays at home during the Christmas, Easter holidays.

However, students will have similar expectations as residents from the Corporation for local services including GP, sexual health, mental health and wellbeing as well as supermarkets which are priced effectively for students. We also note that the next door building has recently been given planning permission to be redeveloped as a boutique hotel for business travellers and clients. Indeed, safety implications should be considered for students given a hotel being situated next door.

We therefore urge the City planning administration and Committee to object to this application given the points we have outlined above.

Yours faithfully,

Rt. Hon. Lord Mayor

James Tumbridge CC

Jason Groves CC

Aaron D'Souza CC

Nicholas Lyons

Distinguished friends

Maria Adebowale-Schwarte
Sukhpal Singh Ahluwalia
Riz Ahmed
Sughra Ahmed
Sir Keith Ajegebo
George Alagiah OBE
Professor Claire Alexander
Professor Peter Atkins
Julian Baggini
Zelda Bayestock
Richard Beswick
Professor Dinesh Bhugra CBE
Karan Bilimoria (Lord Bilimoria of Chelsea CBE DL)
Sir Geoffrey Bindman QC
Karen Blackett OBE
Sir Nicholas Blake
Sir Ian Blatchford
David Blunkett (Lord Blunkett)
Achim Borchardt-Hume
Mihir Bose
Alain de Botton
John Bowers QC
Stephen Briganti
Des Browne (Lord Browne of Ladyton)
Rickie Burman
Mukti Jain Champion
Paul Canoville
Saimo Chahal QC
Reeta Chakrabarti
Shami Chakrabarti (Baroness Chakrabarti) CBE
Stephen Claypole
Professor Robin Cohen
Professor Linda Colley CBE
Professor David Crystal OBE
Angélica Dass
Prakash Daswani
Navnit Dholakia (Lord Dholakia)
CLr Ibrahim Dogus
Sir Lloyd Dorfman CBE
Alf Dubs (Lord Dubs)
Sir John Dyson (Lord Dyson)
Damien Egan
Althea Efunshile
Shreela Flather (Baroness Flather)
Daniel Franklin
Dr Edie Friedman
Manjit S Gill QC
Teresa Graham CBE
Susie Harries
Naomie Harris
Professor James Hathaway
David Hencke
Sophie Herxheimer
Afua Hirsch
Michael Howard (Lord Howard of Lympne) CH QC
Clive Jacobs
Kevin Jennings
Sir Adrian Johns KCB CBE DL
Shobu Kapoor
Jackie Kay
Ayub Khan-Din
Professor Turi King
Professor Francesca Klug OBE
Sir Hans Kornberg FRS
Professor Tony Kushner
Rt Hon Kwasi Kwarteng MP
Kwame Kwei-Armah OBE
David Kynaston
Dr Brian Lambkin
Mark Lewisohn
Joanna Lumley OBE
Michael Mansfield QC
Sue McAlpine
Neil Mendoza (Lord Mendoza)
David Miles CBE
Hashi Mohamed
Abigail Morris
Hugh Muir
Dr Tessa Murdoch
Sandy Nairne CBE
Bushra Nasir CBE
Susheila Nasta
Eithne Nightingale
John O'Farrell
Sir Kenneth Olisa OBE
Kunle Olulode
David Olusoga OBE
Julia Onslow-Cole
John Orna-Ornstein
Herman Ouseley (Lord Ouseley)
Ruth Padel
Professor Panikos Panayi
Bhikhu Parekh (Lord Parekh)
Nikesh Patel
David Pearl
Caryl Phillips
Dr Mike Phillips OBE FRSL FRSA
Trevor Phillips OBE
Sunand Prasad
Aubrey Rose
Michael Rosen
Dr Cathy Ross
Sir Salman Rushdie
Dr Jill Rutter
Professor Philippe Sands QC
Sir Konrad Schiemann
Richard Scott (Duke of Buccleuch) KBE
Rt Hon Sir Stephen Sedley
Dr Maggie Semple OBE
Saira Shah
Babita Sharma
Nikesh Shukla
Professor Arun Singh
Jon Snow
Robert Sonig
David Spence
Dr Danny Sriskandarajah
Stelio Stefanou OBE DL
Lord Dick Taverner QC
Professor Robert Tombs
Rumi Verjee (Lord Verjee) CBE
Patrick Vernon OBE
Edmund de Waal OBE
Iqbal Wahhab OBE FRSA
Yasmin Waljee OBE
Sayeeda Warsi (Baroness Warsi)
Sir David Warren KCMG
Iain Watson
Dr Debbie Weekes-Bernard
Henning Wehn
Nat Wei (Lord Wei)
Janet Whitaker (Baroness Whitaker)
Gary Young



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Lewisham Shopping Centre
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[ALL OUR STORIES](#)

30 January 2023

Jessica Robinson
Principal Planning Officer
City of London Corporation
Guildhall
EC2P 2EJ

Dear Ms Robinson,

Development Proposals at 65 Crutched Friars, City of London, EC3N 2ES (application ref: 22/00882/FULMAJ)

I write on behalf of the Trustees of the Migration Museum in support of the above planning application that presents a unique and exciting opportunity for us to deliver Britain's missing museum – a moving and inspiring landmark new cultural destination that puts the long, rich and complex story of the movement of people, both to and from these shores over thousands of years, right at centre stage, where it belongs, as a celebrated and essential strand of our national consciousness.

Migration is a story that connects every one of us - for we all have migration stories, whether of immigration or emigration, if we dig into our family past - and the museum will provide a calm, stimulating and enjoyable backdrop and context for conversations about migration, race and Britain's colonial past and beyond that often in the public sphere can be so heated and polarising. The museum will deliver a powerful education offer for schools and other learners, helping to equip a generation of young people with the knowledge and skills they require to become active and tolerant citizens. We will offer a vibrant cultural programme of exhibitions, events, creative workshops and opportunities for building skills and career pathways, particularly within the creative industries, as well as for corporate training and events.

We cannot think of a more fitting or resonant location for the Migration Museum than the Eastern edge of the City of London: globally at the heart of historic and contemporary stories of travel, trade, movement and displacement (the Roman city and walls, Hanseatic League, Old Jewry, medieval Italian bankers, London's first coffee house, the world's oldest Dutch Protestant church, Reuters, the Fen Court Slavery memorial – the list is endless), a stone's throw from the richly diverse residential and corporate communities we aim to serve and adjacent to the offices of the Portal Trust with whom we have many shared objectives. The City has a proud history of support for cultural institutions and activities and a Migration Museum is a fitting tribute to the long and embedded history of migration that has been critical to the City's success in attracting talent and conducting business. The Migration Museum will attract diverse, representative

audiences from across London and beyond, including a large proportion who do not regularly engage with traditional arts and culture, as well as destination visitors from across London, the UK and internationally all of whom will contribute to and benefit the area's economy.

Our Migration Museum in the City of London is poised to deliver:

- A unique destination attracting 140k visitors annually, presenting a stimulating and varied programme that will draw repeat visits by local residents and workers, as well as a compelling cultural offer for visitors from further afield including 15% from outside London and 15% international tourists for whom the museum will have strong relevance and appeal.
- Annual economic impact of £8m including £6m direct and £2m indirect impact.¹
- National and global reach and relevance: the London Migration Museum will lie at the heart of a national museum 'ecosystem' that includes pop-ups in retail centres nationwide; and the museum actively drives and participates in both national and international Migration Museum Networks.²
- Stylish, cutting-edge curation and a platform for the museum's extensive creative community of artists and story-tellers; producing lively, topical exhibits as well as an immersive experience exploring the long sweep of Britain's migration history.
- Vibrant daytime and evening events - from discussions to dance, comedy nights to cookery classes and fashion to football - animating the museum as a constantly living space.
- Audiences that are younger and much more ethnically and socio-economically diverse than the average for London museums.³
- A highly relevant offer for more than 12k visiting school children each year as well as indirect reach to tens of thousands more through the museum's established programme of teacher training and partnerships with all major examination boards.⁴
- A high-profile annual competition for young people to design exhibits that will be co-created with our artistic community and actually displayed in the museum.
- Skills-building workshops, mentoring and opportunities for young people to drive pathways to employment in the creative industries, through engagement with local residents (eg Mansell Street estate) and schools (eg The Aldgate School).
- A welcoming, resonant stimulus and backdrop for corporate training to reflect the richness of diverse workforces through facilitated Diversity, Equity and Inclusion training, team building, away days and events.
- A destination café in which all food and drink is part and parcel of the migration story.
- A curated concept shop in which all products are made by migrant-led brands and associated makerspace for drop-in creative workshops during the day and at weekends.
- Lively external spaces for installations, performances and more, merging the outside with the inside, increasing vibrancy and accessibility for all.

¹ Calculated according to the Association for Independent Museums Toolkit August 2021 and HM Treasury Green Book 2022

² Since 2017, the Migration Museum has convened a popular national knowledge and skills sharing Migration Network involving hundreds of museums and heritage organisations across the UK, steered by the National Trust, Museums Association, Oxford University's Centre on Migration Policy and Studies, Horniman Museum and other partners, and since 2020 has participated in the international Migration Museums Network convened by the International Coalition of Sites of Conscience.

³ The Migration Museum's audiences in Lewisham are much more representative of London's population than the average for London museums: 48% Black and minority ethnic compared with just 16% London museums and 29% from groups classified as 'low arts-engaged' compared with 15% London museums according to evaluation by The Audience Agency.

⁴ A [2021 survey](#) of 500 teachers by the House of Commons Petitions Committee that found that 70% believe the curriculum does not reflect the diversity of modern Britain and 85% want training to assist with how to teach cultural diversity, which many see as a 'difficult' or 'sensitive' subject. All major exam boards now offer migration modules at GCSE History, in response to increasing calls for pupils as well as teachers for more and better teaching about migration and related issues. [Government statistics](#) show that British classrooms are increasingly diverse with 34% of primary school children having a minority ethnic (non-White British) background, compared with 19% of the general population. 19% of all British school pupils have a first language that is not English.

We believe that a permanent and significant Migration Museum is an important and long-overdue addition to Britain's cultural landscape, and our partnership with Dominvs has generated the first truly appropriate and realistic opportunity in the 10 years that we have existed to deliver it at scale. Though increasingly we drive income through sales we are, as a charity, also largely reliant on donations (from trusts, government and private individuals). Not only does Sukhpal Ahluwalia, founder of Dominvs, have a strong migration story (he arrived in Britain as refugee from Uganda 50 years ago) but he is also a philanthropist who is personally invested in delivering the Migration Museum that Britain so richly deserves. We have negotiated Heads of Terms with Dominvs that will guarantee the Migration Museum at least 2.4k sq m of space over three floors, rent and service-charge free for a term of 60 years, plus a guarantee to underwrite the museum's first three years' operating costs. Dominvs has further undertaken to support the museum's capital fundraising campaign (likely £11-13.5m for fit out) with an initial donation of £0.5m - a hugely enabling step that will permit the museum to engage a first-class fundraising team. On top of all that, the partnership with Dominvs affords the museum the considerable benefit of moving into a purpose-built space that it can co-design and is properly fit for its requirements, including an eye-catching triple-height entrance and ground floor exhibition spaces visible from the street as well as more intimate spaces suitable for smaller events and education workshops.

It is difficult to overstate what all of this means for the Migration Museum. Truly it feels like a once in a lifetime opportunity to deliver a cutting-edge, state-of-the-art Migration Museum, built to the museum's requirements, that is also financially secure and viable. A refurbished existing building, without the opportunity to create flexible, purpose-built spaces, would likely be more costly and unlikely to offer anything like the same opportunity to deliver the high-calibre museum to which we aspire. We are confident that the interest that the entire Ahluwalia family has expressed in actually enabling delivery of a Migration Museum that succeeds and is viable is genuine, and we welcome the news that Dominvs proposes to retain this development once completed. We know that Dominvs has experience of delivering significant projects, and an understanding of the tourist market, running hotels across the capital including the Hilton 'Lost Property' hotel by St Paul's in the City of London. The fact that Dominvs will be our landlords and neighbours, as well as our partners, inspires great confidence about the success of our joint project both now and in decades to come.

Over the past two years the Migration Museum has significantly developed its board to enhance its profile and incorporate an impressive array of skills. As Chair of both the Guardian Media Group and Oxfam GB, I bring significant experience in the media and not-for-profit sectors, and I have good knowledge of the cultural landscape as a trustee of English Heritage and former deputy Chair of the National Trust, and I, as well as others on the board, have significant commercial expertise. Our board contains leading historians Professor David Olusoga OBE and Professor Margot Finn; BBC broadcaster George Alagiah OBE; Eric Langham, founder of leading cultural consultancy Barker Langham with vast experience of planning for and delivering leading cultural attractions; Sarah Caplin, co-founder of Childline; Mohan Mansigani OBE, former CFO of Costa Coffee and Chairman of Bob and Berts, a chain of coffee shops; Ayesha Hameed, who leads on community engagement for the GLA; best-selling author Robert Winder; and Kuljit Dhillon head of strategy at the General Medical Council who has experience of working in government, including at the DCMS.

In addition, we are supported by nearly 150 distinguished friends - eminent people from all walks of life and across the political spectrum who support our aims and are frequently prepared to become practically involved with the work of the museum. I am confident that with our trustees, distinguished friends, talented executive team and in particular the bespoke support offered to us by Dominvs, we are capable of delivering a project on this scale. Enabling

support, of the type offered to us by Dominvs is, quite simply, critical to our ability to deliver the permanent Migration Museum successfully and we could not do so without it. The time is now right for there to be a permanent Migration Museum for Britain and we have momentum and the necessary partnerships to deliver it on our side. Delay could significantly damage our ability to deliver this project and, as I have already mentioned, it is extremely rare for an organisation like ours to have such an offer as is now on the table and nothing similar has presented itself to us since our inception over 10 years ago.

In response to the particular objections raised by the Lord Mayor and Councillors from Tower Ward in their letter of 15 December 2022, we would observe as follows:

- Whilst we understand that provision of office accommodation is a priority for the City, we note that this proposed development is within the demographically more mixed Eastern area, closely adjacent to significant residential communities for whom the museum will provide a particularly strong and relevant offer to support education, training and skills, within a few minutes' walk. We believe that the museum will present a strong offer for a more diversified use, population and visitor base for the City.
- Through varied and imaginative programming, the museum will deliver a significant cultural and educational programme that is highly accessible and free to enter, but also exhibits, performances and events that are tailored for a highly arts-engaged and high-spending clientele, including international business travellers and tourists for whom the museum's subject matter will have particularly strong resonance and appeal. We anticipate high demand from local businesses, including insurance companies, for corporate partnerships, training, team-building and venue hire.
- We trust that the museum supports the 'Destination City' vision in that it will attract new, younger and more diverse audiences into the City, whilst at the same time drawing international tourists and providing a powerful cultural, educational and training offer for local workers and residents. Given its location, a matter of minutes' walk away from a number of very high-profile tourist destinations, we would expect to be able to market the Migration Museum as a significant new addition to the City of London's cultural map.
- The proposal will help diversify the City's land use base, increasing its attractiveness to investors, visitors and businesses, positively varying the City's socioeconomic demographic. This accords with the City's London Recharged and Destination City objectives and reflects the City's Development Plan objectives for the Aldgate/Tower Area of Change.
- International students are a good fit conceptually for the museum (and indeed constitute up to 10% of the museum's current visitors and many of its volunteers and student placements) and are likely consumers of the museum's cultural and educational programmes, visitors to its shop and café and participants sharing their stories.

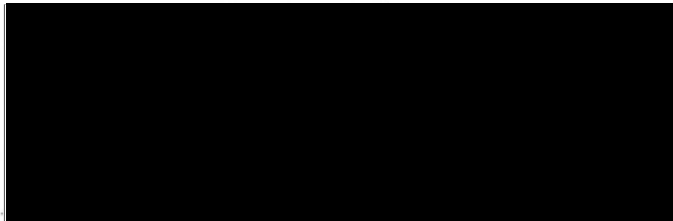
We hope that you will agree that the present planning application represents a unique opportunity to deliver a permanent Migration Museum in the City of London, enhancing the City's reputation as a cultural destination and reinforcing its history as a place where the world comes to do business. The new museum would be adjacent to the offices of the Portal Trust with whom we have many shared objectives.

Taking account of all of the above, I urge you to support this ambitious and exciting scheme that will deliver a ground-breaking new Migration Museum whose subject matter lies at the heart of national debates that could not be more relevant or important, at the same time shining a vivid spotlight on the City of London which will be its home.

I should welcome the opportunity to discuss this with you should be delighted to host you and any colleagues at our temporary home in Lewisham so that we can tell you more. Please let me know if there is a convenient time that would suit you to visit with the next couple of weeks.

I very much look forward to hearing from you.

Yours sincerely



Charles Gurassa, Chair of Migration Museum

Cc Chris Hayward (Chair of Policy and Resources Committee)
Wendy Hyde (Chair of Culture, Heritage and Libraries Committee)
Planning Applications Sub-Committee Members
Tower Ward Members

Amy Williams
Department Of Planning and Transportation
City Of London Corporation
PO BOX 270
Guildhall
London
EC2P 2EJ

Dear Ms Williams,

Ref: 65 CRUTCHED FRIARS LONDON EC3 (APPLICATION REF 22/00882/FULMAJ)

I write on behalf of the EC Business Improvement District (the EC BID) this being the BID for the Tower Cluster area of the City of London, as officially launched in April 2022, to work with and for the long term benefit of occupiers in the area in collaboration with the City of London Corporation.

Whilst the subject site falls out-with the geographical footprint of the BID itself it does nevertheless fit into the hierarchy of buildings and physical spaces which all contribute to this part of the City; as such we see the redevelopment of the site as being a key part of the long term regeneration of the area.

As is widely recognised the consequences of COVID on the City of London have been particularly severe as the multiple lockdowns, coupled with numerous public transport strikes over recent months, have all impacted the commuting and working patterns in the area.

The advent of a curtailed working week - the Tuesday, Wednesday and Thursday phenomenon - has seen a major downturn in the fortunes of many of the independent F&B businesses throughout the area. When the impact of energy price inflation is added to this equation we expect further stress throughout 2023 as the hybrid working patterns which have emerged since COVID look set to perpetuate.

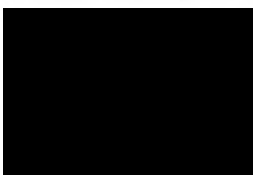
For this reason we are pleased to see the proposed mix of uses for the subject site which we believe if approved will play an integral part in the redefinition of the City of London. This will build upon the emerging diversification of the immediate area which already benefits from a significant number of hotels which serve both the business community and the major tourist attractions at the Tower of London and Tower Bridge. A broadening of the area's population mix to build upon other emerging education related projects of this ilk is a great positive for the area.

Evidently both the weekday and weekend populations of the area could be significantly increased by the proposed development with consequential benefits in increased business opportunity for the local eco-system; the incorporation of the supporting cultural facility of the proposed Migration Museum and indeed the proposed pocket park feature can only reinforce this trend to diversify.

Overall we see that the proposed development can form a key element in supporting the City Corporation's Destination City Initiative to make the City a more attractive and diverse place to work, live, learn and visit.

We are therefore pleased to offer our support for the proposed scheme.

Yours sincerely,



Andrew J Reynolds
Chair

Eastern City Business Improvement District
EC BID, 15 Bishopsgate, London EC2N 3AR





By email: Jessica Robinson, Principal Planning Officer at the City of London Corporation
jessica.robinson@cityoflondon.gov.uk

2 February 2023

Dear Jessica Robinson,

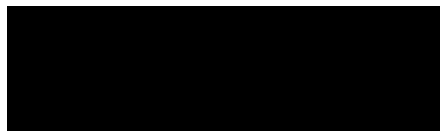
Development Proposals at 65 Crutched Friars, City of London, EC3N 2ES (application ref: 22/00882/FULMAJ)

I am writing in support of the above application for planning consent that will afford the Migration Museum the opportunity it deserves to establish a long-overdue permanent home. I am a long-term friend and supporter of the Migration Museum and I strongly support their vision and mission to deliver a permanent institution that foregrounds the rich and complex story of migration that is such an important part of who we are, where we have come from, and where we are going. We need an institution like the Migration Museum to provide a lively, accessible and welcoming context for conversations about migration that can be so heated and polarising, and where a wide range of people can feel that they are represented and belong. I have seen at first hand the quality of the museum's exhibitions, their compelling and thoughtful events (including a competition that I judged for young people to actually design a museum exhibit) and their innovative approach to public engagement attracting audiences new to and unusual for museums. The Migration Museum is an energetic and inspiring organisation and I know that they will bring their committed and fresh approach to all they do in their permanent home.

As Director of the forthcoming V&A East I have a strong personal commitment to making collections accessible, engaging young people and building creative skills that enable people to flourish. Much of our work in developing V&A East chimes with the values and aspirations of the Migration Museum and I can imagine many ways in our organisations will be able to work together, particularly in engaging East London communities in creative new ways. I believe that the Migration Museum would be an asset to the City's cultural offer, as well as to London and the nation. I know that the Migration Museum's team is highly collaborative and will welcome partnerships and co-delivery across a wide range of cultural and community organisations.

As stated in the letter from the museum's trustees, opportunities like the present for cultural organisations are extremely rare and it is testament to the Migration Museum's tenacity, skill and expertise that they now have a realistic, viable option on the table. I wholeheartedly support this application and look forward to continuing my support and collaboration with the Migration Museum long into the future.

Yours sincerely,



Gus

Dr Gus Casely-Hayford, Director of V&A East, Professor of Practice, SOAS, University of London

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Email: g.caselyhayford@vam.ac.uk | Phone: +44(0)20 7942 2301

Jessica Robinson
Principal Planning Officer
City of London Corporation
Guildhall
London EC2P 2EJ

[REDACTED]

3rd February 2023

Dear Jessica

Re: Development Proposals at 65 Crutched Friars, City of London, EC3N 2ES (application ref: 22/00882/FULMAJ)

I am writing in my capacity as Director of Development at Derwent London to support the above application. In my view the Migration Museum is an inspiring organisation, and a permanent Migration Museum will be a valuable and long-overdue addition to Britain's cultural map in the heart of the City which could not be more a resonant or appropriate place for it

I have taken a long-term interest in the Migration Museum and can attest to the high quality of their exhibitions and events and the importance of their wide-ranging education programme for schools and other learners. I have been particularly impressed by their value as a place-maker for local communities, driving local well-being, participation, inclusion and pride in the local area, and their role as a stimulus both for skills-building driving pathways into the creative industries and also as a resonant backdrop for corporate DEI training. I anticipate that business and residential tenants in Derwent London properties close to Fenchurch Street are likely to engage with the museum for entertainment, education, training and skills.

I was proud to play an important role in supporting the museum's search for a permanent home and advising on the planning and property processes and anticipate continuing to support the museum in this way for many years to come.

The Migration Museum now has a game-changing once in a lifetime opportunity to create a permanent museum that is both deliverable and viable in the City thanks to support from Dominvs founder Sukhpal Ahluwalia who was a refugee to Britain, with a remarkable story of his own. From my own experience, I am aware that opportunities such as this come along only rarely, and I urge the Planning Sub-Committee to approve this application.

Yours sincerely

[REDACTED]

Richard Baldwin
Director of Development

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Jessica Robinson
Principal Planning Officer
City of London Corporation
Guildhall
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Forest Hill
London SE23 3PQ

020 8699 1872
horniman.ac.uk

8 February 2023

Dear Ms Robinson

**Re: Development Proposals at 65 Crutched Friars, City of London EC2N 2ES
(application ref: 22/00882/FULMAJ)**

I am writing in strong support of the above proposals. I have known the team at the Migration Museum for many years and have been impressed by the progress they have made from very small beginnings to now delivering a vibrant cultural offer in the heart of Lewisham Shopping Centre. As near neighbours our two institutions have much in common and we have worked together on shared exhibits, expertise and learning. The Horniman (currently the Art Fund Museum of the Year) has also been involved since inception as a founding partner of the museum's Migration Network that successfully links hundreds of organisations across the UK to bring out and share best practice in migration story-telling nationwide.

Telling migration stories has been a long-term personal passion of mine, and I curated what was at the time a ground-breaking exhibition about migration in the Capital three decades ago in 1993 at the Museum of London where I was then Head of the Department of Early London History and Collections. I believe that it is high time that we recognised the central importance of migration in all our lives and I cannot think of a more appropriate or exciting location for a permanent Migration Museum to celebrate this story than in the heart of the City of London where so many of those stories have their origins. I welcome the museum's innovative plan to complement the London site with pop-ups in shopping centres nationally and look forward to continuing to work in partnership for many years to come.

Yours sincerely



Dr Nick Merriman
Chief Executive and Content Director





Jessica Robinson
Principal Planning Officer
City of London Corporation
Guildhall
London EC2P 2EJ

10 February 2023

Dear Ms Robinson,

Re: Development Proposals at 65 Crutched Friars, City of London EC2N 2ES (application ref: 22/00882/FULMAJ)

I am writing to confirm the Museum of London's support for The Migration Museum relocating to the City of London.

I have known about the Migration Museum for many years and have watched their progress from small pop-ups and collaborations to now delivering a vibrant cultural offer in the heart of Lewisham Shopping Centre. Many of my colleagues at the Museum of London have worked with the Migration Museum on several projects and we have been impressed by their approach to authentic storytelling and public engagement which sees them welcoming a wide range of audiences who are new for museums.

This important story and this great organisation will make a valuable contribution to the City as a destination and as a superb facility for learning.

We hope that the vision and plans will be realised enabling the story of migration which is the essential story of London to be expressed.

Sincerely,



Sharon Ament
Director, Museum of London

Professor Philippe Sands KC

10 February, 2023

Jessica Robinson
Principal Planning Officer
City of London Corporation
Guildhall
London EC2P 2EJ

Dear Ms Robinson

**Re: Development Proposals at 65 Crutched Friars, City of London EC2N 2ES
(application ref: 22/00882/FULMAJ)**

- I have been a supporter and friend of the Migration Museum for many years. Indeed, I spoke at the museum's very first event back in 2013 about my research into my legal hero, an immigrant to Britain named Hersch Lauterpacht, who played a key role in prosecuting the Nazis at Nuremberg and who later became the subject of my best-selling book East West Street.
- I believe the Migration Museum is a genuinely important institution for Britain and I support it unreservedly. The museum will make a vital contribution, reminding us of the richness and diversity of our country, and of a world in constant flux and movement, with all the benefits, challenges and risks posed. It seems to me that this opportunity to create a permanent Migration Museum is truly a one-off, which should be embraced as delivering a tremendously positive addition to the City of London's cultural offer, as well as supporting the City's commitment to increasing and diversifying footfall and relevance for a broad range of people. Really
- I strongly support this application for planning consent.

Yours sincerely

11KBW

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SIR LLOYD DORFMAN CVO CBE

Jessica Robinson
Principal Planning Officer
City of London Corporation
Guildhall
London EC2P 2EJ

9 February 2023

By Email & Post

Dear Ms Robinson,

Re: Development Proposals at 65 Crutched Friars, City of London EC2N 2ES (application ref: 22/00882/FULMAJ)

I am writing in strong support of the above planning application. It offers a truly unique opportunity for the Migration Museum to establish what I passionately believe is a much overdue and vital cultural institution for this country – an institution to educate and celebrate the pivotal role that migration has played in its history. The home for that institution should absolutely be in the City of London.

I have been following the progress of the Migration Museum over a number of years and have supported them both financially as well as in an advisory capacity.

As someone of Jewish immigrant descent, I also have a personal interest in seeing Britain's migration story told. Furthermore, as a strong supporter of the arts, I believe the Migration Museum will make a significant addition to the City's cultural offering - drawing in new daytime and evening visitors, adding vibrancy and diversifying footfall. I own two office properties very close to this proposed development - in Lloyd's Avenue and Throgmorton Street - and believe the Migration Museum will also play an invaluable role in supporting diversity, equality and inclusion training for workers in and around the area at a time when awareness of such issues could not be more pressing or important.

I know some of the trustees of the Migration Museum well and have also been impressed by the museum's executive team and what they have achieved to-date in building this ground-breaking institution from scratch and without a permanent home. The support now offered to deliver the Migration Museum from Sukhpal Ahluwalia and Dominvs Group is remarkable and effectively means that this permanent home can now be both delivered and sustained.

I strongly urge the Planning Sub-Committee to support this application which, if granted, will provide the City of London with a ground-breaking and exciting major new cultural destination. It will embody a story of both national and global significance. It will also attract visitors from near and far at a time when the City of London needs to do everything it can to revitalise activity after the pandemic.

Kind regards.


Yours sincerely,



Sir Lloyd Dorfman CVO CBE

IQBAL WAHHAB OBE

59 Ling's Coppice, London SE21 8SX

 07501729452

Jessica Robinson

Principal Planning Officer

City of London Corporation

Guildhall

London EC2P 2EJ

February 12, 2023

Dear Ms Robinson

Re: Development Proposals at 65 Crutched Friars, City of London EC2N 2ES (application ref: 22/00882/FULMAJ)

I am the founder of London restaurants The Cinnamon Club and Roast and a former High Sherriff of Greater London.

I have been a supporter and contributor to the Migration Museum's creative output for many years. I have also taken a particular interest in the museum's search for a permanent home including the possibility that this might incorporate a destination curated restaurant or cafe based on the extremely rich variety of food now available in Britain largely as the result of migration.

The prospect of the museum finding a permanent home at 65 Crutched Friars is a very exciting one. The City has been an incubator of so many successful careers for migrants over time and so the location is in many ways perfect place to not just celebrate the achievements of many who have made Britain their home and contribute to its strength, but also to act as a place of inspiration for more recent migrants and allow The City to be even more of a beacon of inclusion.

I wholeheartedly support this planning application on the basis that the Migration Museum is a really important institution that deserves a permanent home and it seems the partnership with Dominvs is a realistic way to make sure that it is actually delivered in viable fashion.

Yours sincerely

