



Planning Applications Sub-Committee

Date: TUESDAY, 10 SEPTEMBER 2024

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

Members:

Deputy Shравan Joshi(Chairman)	Antony Manchester
Graham Packham (Deputy Chairman)	Deputy Brian Mooney
Deputy Randall Anderson	Deputy Alastair Moss
Ian Bishop-Laggett	Eamonn Mullally
Michael Cassidy	Alderman Jennette Newman
Deputy Simon Duckworth	Deborah Oliver
Mary Durcan	Judith Pleasance
Deputy John Edwards	Deputy Henry Pollard
Anthony David Fitzpatrick	Alderman Simon Pryke
Deputy John Fletcher	Ian Seaton
Deputy Marianne Fredericks	Hugh Selka
Jaspreet Hodgson	Luis Felipe Tilleria
Amy Horscroft	Shailendra Kumar Kantilal Umradia
Alderman Robert Hughes-Penney	William Upton KC
Alderman Elizabeth King	Jacqui Webster
Deputy Natasha Maria Cabrera Lloyd-Owen	
Deputy Charles Edward Lord	

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Ian Thomas CBE
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 of the Planning Applications Sub-Committee meeting held on 2 July 2024.

For Decision
(Pages 5 - 32)

4. **45 BEECH STREET, LONDON, EC2Y 8AD**

Report of the Director of Planning & Development.

For Decision
(Pages 33 - 342)

5. **CITY OF LONDON SCHOOL FOR GIRLS, ST GILES' TERRACE, BARBICAN, LONDON, EC2Y 8BB**

Report of the Planning & Development Director.

For Decision
(Pages 343 - 416)

6. *** VALID PLANNING APPLICATIONS RECEIVED BY THE ENVIRONMENT DEPARTMENT**

Report of the Chief Planning Officer & Development Director.

For Information

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

Report of the Chief Planning Officer & Development Director.

For Information

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

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

PLANNING APPLICATIONS SUB-COMMITTEE

Tuesday, 2 July 2024

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Tuesday, 2 July 2024 at 10.00 am

Present

Members:

Deputy Shravan Joshi MBE (Chairman)
Graham Packham (Deputy Chairman)
Ian Bishop-Laggett
Michael Cassidy
Deputy Simon Duckworth OBE DL
Mary Durcan
Deputy John Edwards
Anthony David Fitzpatrick
Deputy John Fletcher
Deputy Marianne Fredericks
Alderman Robert Hughes-Penney
Deputy Natasha Maria Cabrera Lloyd-Owen
Deputy Charles Edward Lord
Deputy Brian Mooney BEM
Deputy Alastair Moss
Eamonn Mullally
Alderwoman Susan Pearson
Deputy Henry Pollard
Hugh Selka
William Upton KC
Jacqui Webster

In attendance (Observing Online):

Judith Pleasance

Also in attendance:

Deputy Peter Dunphy, Chief Commoner

Officers:

Zoe Lewis	-	Town Clerk's Department
Polly Dunn	-	Interim Assistant Town Clerk
Fleur Francis	-	Comptroller and City Solicitor's Department
Gemma Delves	-	Environment Department
David Horkan	-	Environment Department
Ian Hughes	-	Environment Department
Kerstin Kane	-	Environment Department
Georgia McBirney	-	Environment Department
Rob McNicol	-	Environment Department
Tom Nancollas	-	Environment Department

Taluana Patricio	-	Environment Department
Joanna Parker	-	Environment Department
Gwyn Richards	-	Environment Department
Robin Whitehouse	-	Environment Department
Peter Wilson	-	Environment Department

1. **APOLOGIES**

Apologies were received from Deputy Randall Anderson, Jaspreet Hodgson, Antony Manchester, Deborah Oliver, Judith Pleasance, Alderman Simon Pryke, Ian Seaton and Shailendra Umrada.

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

Deputy Edward Lord stated that he had been advised that the Leathersellers Company had an interest in Agenda Item 4 and as he was a member of the Leathersellers Company he would therefore withdraw from the meeting for Agenda Item 4.

Mr Mullally stated he had been in discussion with Legal Officers regarding the risk of an interest between himself, his wife, who was the Church of England prelate for London and Agenda Item 4 in respect of St Helen's Square. Due to the legal separation of the parish and the diocese, he considered there was not a conflict of interest. Legal Officers and the Diocese of London supported this view and therefore he would take part in the consideration of Agenda Item 4.

3. **MINUTES**

RESOLVED – That the public minutes of the meeting held on 11 June 2024 be agreed as a correct record.

4. **1 UNDERSHAFT, LONDON, EC3A 8EE**

The Sub-Committee considered a report of the Planning and Development Director concerning demolition of the existing buildings, retention and partial expansion of existing basement plus construction of a ground, plus 73 storey building (plus plant) for office use (Use Class E(g)); Retail/food and beverage (Use Class E(a)-(b)); Public amenity space (Flexible Class E(a)-(d) / Class F1 / Sui Generis); publicly accessible education space and viewing gallery at levels 72 and 73 (Sui Generis); public cycle hub (Sui Generis); plus podium garden at level 11, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

The Town Clerk referred to those papers set out within the main agenda pack as well as the Officer presentation slides and two addenda which had been separately circulated and published.

Officers presented the application stating that the site was bounded to the south by Leadenhall Street, to the east by St Mary Axe and to the north and west by Undershaft. There were heritage assets nearby notably the Grade I listed Lloyd's building to the south, the Grade I listed St Andrew's Undershaft to the east and the Grade I St Helen's Church to the north. The St Helen's Place

Conservation Area was also to the north. The site was within the City Cluster, the strategic outlet for the City's growth to maintain its economic objectives and its international competitiveness. Members were shown the proposed scheme amidst the existing and consented cluster of towers in the location. The location was within the City Cluster policy area in both the adopted 2015 local plan and the proposed City Plan 2040. It was broadly at the heart of the cluster.

Members were shown an aerial view of the site showing the existing building which was the 1960s Commercial Union Tower which had been remodelled in the 1990s and was now subject to a certificate of immunity from listing. Members were shown an image of extensive St Helen's Square, along with the Cheese Grater and St Andrew Undershaft. To the west of the site was a cluttered area of public realm bestrewn with railings and bollards and a large ventilation shaft. The existing road of Undershaft kinked around the site to the north and west. A view was shown with Undershaft to the north and St Mary Axe and the Gherkin off to the east. A view of St Mary Axe, looking south at the Grade I listed Lloyd's building in the distance and the existing Commercial Union Tower in the foreground. Members were shown the servicing ramp from which the existing building and plaza was serviced. It created a rather unsightly rift in the townscape and had an unsympathetic presence in relation to the Grade I listed church in the background.

The Officer informed Members that the application was for a 74-storey office development which would deliver over 154,000 square metres of flexible Grade A best-in-class office floor space with the potential to accommodate nearly 9,500 jobs. It was a proposal of significant strategic importance to the City's international competitiveness. Alongside this, a suite of unique and distinctive public spaces would be woven through the proposal, culminating in the highest public civic space in Britain. The development would have the highest architectural and sustainable credentials. It would transform and enrich the ground floor City around it and would optimise the more strategic site in the cluster.

Members were shown existing and proposed basement plans highlighting long stay cycle parking with approximately 2,200 spaces, 200 short stay spaces and end of trip facilities which were all fully policy compliant.

The proposed building footprint was larger than the existing footprint as it was working hard to optimise the site. It incorporated five separate entrances for the separate functions. The building incorporated three public entrances. There was a dedicated servicing entrance to the northeast of the site and the large office entrance accommodating the rest of the St Mary Axe elevation together with extensive relandscaping and enhancements to the public realm around it. Members were shown an existing floor plate and proposed floor plates to reflect the way the building's mass changed as the building stepped back and recessed to create its distinctive form and deliver a suite of different office floor plates for a range of different users as would befit the central cluster location. As well as the office floor plates there were significant amenity levels breaking up the building and providing generously planted and generously sized

sheltered spaces with spectacular views over the capital, meeting market demand. Architecturally the building would be an outstandingly contextual building in the sense that this was a location in the City where there was a great degree of architectural charisma including the iconic forms of the Lloyd's Building, the Cheese Grater and the Gherkin. The building would introduce a series of interesting architectural approaches and high-quality design ranging from the subtle pale elevations fanning out from the base to the striking podium garden which was suspended 42 m above the ground floor and the zinc and vitreous enamel cladding of the main office tower rising to the apex.

The Officer showed the proposed elevations and stated that the building had been designed with circular economy principles in mind. It reused the extensive basement levels on the site, incorporated facades to optimise shading and it was a fully electric and very sustainable building. The existing and proposed west and north elevation showed the significant optimisation of the site that the scheme would bring forward. An existing and proposed cross-section showed the disposition of those uses throughout the building with the public uses indicated at ground floor at Levels 10,11, 12, 72 and 73 with the office uses interspersed among those. The location of the lifts was shown to indicate how hard the ground floor plane was working to get people around the scheme.

The crown would be picked out in subtle rippling colour to reflect the civic functions there at the apex of the cluster and would form a striking but yet quite modest and understated new presence. In the long-range views, it would be seen as the apex and the backbone of the City Cluster, with the exciting modern skyline presence distinct from and disassociated from the World Heritage Site.

Members were shown a view with the scheme shown rising in the background as the tallest in the clusters. They were also shown the existing and cumulative view from Queen's Walk showing how the building would almost be like the totem pole of the cluster from which all of the other towers would gently descend and would create a distinctive architectural composition. The Officer outlined the public spaces. In relation to those at the top, people would enter from a generously sized lobby at ground floor level to the north to ensure that logistics and queueing were factored in and an optimal visitor experience was delivered. These would be the highest such spaces in Britain and would be curated by the London Museum, a place for members of the public and state school children to learn about their city. It would also deliver a series of different views to the existing suite of elevated public spaces in the cluster.

The Officer highlighted an image of the classroom in the sky with state school children of all backgrounds being able to enjoy the unparalleled views. The Level 11 podium garden presented a significant architectural moment in the scheme and a place of urban theatre. It would be a large and generous elevated public space unparalleled in London. It would be generously planted, would enjoy fine microclimatic conditions and there would be fine new views of heritage assets such as the Lloyds building from there. It would be supported in its function by the Level 10 and Level 12 amenities. The proposal would create a new destination for the City. Members were shown one of the singular

features of this podium garden, the Oculus, a circular area of walk-on structural glazing, allowing people to admire the ground floor level 42 metres below them.

In an image from Lime Street, Members could see the view of the existing building and square and the proposal with the podium garden suspended 42 metres above this space. The Oculus formed an eye-catching new feature when seen from this distance. Members were shown a closer image of the existing cluttered St Helen's Square at present and the proposal with the lower elevations of the proposed scheme gently fanning out from the base and the podium garden soaring above. The cycle entrance would be located to the west side of the scheme and would provide a dedicated entrance for long and short stay cycle parking and end of trip facilities.

Existing and proposed views of the west side of Undershaft, showed how the area would be transformed, tidied up, made more usable with benches and seating introduced in a striking white column, which would be a water feature and a public artwork acting as a focal point for the space. Undershaft would, as a result of this be realigned to the north. There would be a generously proportioned public lobby to those civic uses at the apex.

Members were shown the existing and proposed condition at St Mary Axe. In the servicing arrangements, the unsightly servicing ramp would be removed. A dedicated servicing entrance which would be set back from the street would be introduced so that vehicles could wait there if the need arose. Servicing would be consolidated and off-peak in the usual way other similar schemes in the cluster were expected to operate. The Officer stated that as part of this transformative scheme, an unparalleled Section 278 agreement would be entered into for the entirety of St Mary Axe to enhance this street in line with the principles of the city cluster vision, set out in 2019. Details of this were to be worked through by Officers in the usual way, but an image was shown which gave an indication of the ambition of the scheme and what it would deliver as a minimum with the rebuilding and enhancement of the entire street which was a crucial artery in the City Cluster. The proposed St Helen's Square would be reimagined as a new inclusive and flexible civic space at the heart of the cluster.

The Officer presented the existing and proposed site plans and stated that the proposed building footprint was larger, worked harder and consequently there was a small reduction in the overall area of public realm at grade across the site. There would be an 18% reduction overall with the building footprint principally to the south on St Helen's Square. It was also the case that the reimagined St Helen's Square would deliver a significantly enhanced public space that would be flexible. The existing level changes of St Helen's Square would be removed along with the irregular planting beds and more usable space would be created together with a mixture of 12 semi-mature trees planted and there would be fixed and movable seating to open up this space for everyone. In addition, the proposed Level 11 podium garden delivered a significant amount of new publicly accessible space, so when the scheme was considered as a whole, it provided an uplift both in quality and quantity of publicly accessible space.

In the existing and proposed view across St Helen's Square looking at St Andrew Undershaft, the existing deficiencies of the square could be seen by the multiple changes in the level, the rather cluttered and irregular layout of the square and also the extensive irregular planting beds that occupied much of the space. Under the proposals, a very simple flush area of public realm would be created in front of the building next to the lifts to the podium garden. There would be a grove of 12 semi mature trees interspersed with seating and planting which would be flexible, programmable and inclusive. There would also be some hostile vehicle mitigation required along the eastern side of the site. In the background there would be new views of the Lloyd's building, another heritage asset which remained possible across the reimagined scene. St Helen's Square, would be a space comparable to Guildhall Yard in scale. The Officer stated that the new building, with its elevated podium garden suspended 42 metres above would create a fascinating new architectural urban moment at the heart of the cluster.

Members viewed a slide showing how the square would remain programmable for events and functions much in the same way as now, including the showing of the Wimbledon tournament. They also viewed a slide showing the space by night and at dusk, showing the interplay at this crucial strategic part of the cluster between old and new, ancient and modern and between architectures of supremely charismatic nature.

In summary, the Officer stated that the proposed scheme would deliver over 154,000 square metres of much needed flexible Grade A, best-in-class office floor space, accommodating up to nearly 9,500 jobs. This would be a significant strategic contribution of office floor space of the utmost importance to the City's economic objectives to maintain its international competitiveness, as well as strengthen the economic base of the City Cluster. One Undershaft stood at the heart of insurance, a critical sector that was growing at a phenomenal rate in the City. This scheme, through delivering strategic floor space and amenities, would further strengthen this growth. The scheme would have the highest social and educational credentials, delivering the highest elevated public cultural classroom space in Britain, curated by the London Museum at the apex, symbolic of the City Cluster of tall buildings, and a free to visit seven days a week inclusive to all podium garden at Level 11. The scheme would create an iconic new destination at the heart of the City Cluster, supporting the City's cultural seven day and evening objectives. Architecturally it would be the totemic centre piece and the backbone of the cluster, a rich and humane tall building, an outstanding architectural moment at the heart of the City, adding to the unique urban theatre of this location. The scheme would carry exemplary sustainability credentials, targeting BREEAM outstanding and designed with circular economy principles to address climate adaptation and mitigation. The scheme would provide significant improvements at ground floor level, including the transformation of Undershaft and St Mary Axe.

There would be a reduction in the extent of ground floor public realm as a result of the necessary lift cores and reception areas to service a building of this strategic importance to the City and deliver the floor space needed. However,

the new reimagined public ground floor realm, would provide a significantly more enhanced, inclusive and flexible St Helen's Square in quality terms, a reimagined south facing public space of generous civic scale at the heart of the cluster. The Officer stated that that the City Cluster was the economic engine of the City, London and the UK economy. To keep pace with GLA employment growth projections, research indicated an absolute minimum of 1.2 million square metres of new office floor space had to be delivered. It was estimated that 85% of this would need to be delivered in the City Cluster, which was a geographically modest area. This site was the single most strategic site in the cluster and in the City and it was vital the floor space capacity on this site was optimised to remain internationally competitive in the years ahead. This had to be balanced with local impacts and the provision of high-quality public realm and other planning considerations. Officers firmly believed the scheme achieved this balance and for the reasons set out in the report, the scheme was recommended for approval.

The Chairman stated that as one of the addenda had been received shortly prior to the start of the meeting, the meeting would therefore be paused for Members to read it.

At this point, at 10.23am, the Chairman adjourned the meeting. The meeting resumed at 10.25am.

A Member asked for clarification on whether a representation from a neighbouring occupier was relevant. The Chairman and Officers confirmed that all representations were relevant as long as they contained relevant planning arguments.

The Town Clerk explained that there were two registered objectors to address the meeting and she invited the objectors to speak.

Mr John Adams JDA Planning Consultancy, stated the City was defined by its public realm, the free, safe and open spaces, where people could simply enjoy the sky and fresh air regardless of age, wealth or background. He commented that the buildings might be magnificent, but it was the spaces between them at street level that brought the City alive. St Helen's Square was a pivotal primary civic space, was 66 metres long and south facing. Pedestrian routes through the City radiated from the square. People crossed the space constantly and it hummed with life. Open space in the Eastern Cluster was very limited. The few places of scale creating a comfortable place for people to gather and enjoy were especially important. The scheme resulted in the loss of 30% of the square itself. It would be reduced from 66 metres to 37 metres in length, which would not be a generous scale for the hard work it would have to do. 60% of this reduced area would be covered by office space.

Mr Adams stated that the 11th floor terrace would result in the sense of space and sky being lost. The urban moment of generous open sky, dramatically surrounded by medieval churches and some of the most iconic buildings of the time would be lost. He commented that the Officer's report criticised the existing layout of Saint Helen's Square and argued that a third of the square was not

publicly accessible and the layout restricted movement. However, to only compare what was proposed with what existed today was a false assumption. The square would be redesigned in any redevelopment option because the basements of the building were below it. It could be and should be a brilliant inclusive space and programmable and active through the day. It should also be attractive at night. The downplaying of the qualities and scale of the square in the Officer report in the section on public realm was incorrect and led to a misleading conclusion, namely that the 11th floor public terraces were of equivalent quality as the square. As a replacement for street level public space, the 11th floor terrace did not begin to compare with Saint Helen's Square in terms of welcome easy access and equitable public realm of scale, with exceptional views of the sky and buildings that defined the City. The gain in public realm to the west of the building in Undershaft was in full shadow and was not comparable in quality to the square.

Members were informed that Policy OS1 of the City Plan 2040 stated that open space should be protected unless there were wholly exceptional circumstances. It also stated that new space at ground level should be created and supplemented, not substituted, through the addition of publicly accessible roof gardens.

Mr Adams raised concern that the application removed space from St Helen's Square and was dominated by the terrace at the 11th floor. The balance was wrong. Exceptional circumstances had not been demonstrated and could not be found to exist unless alternatives that avoided the harm to the public space at street level and the setting of heritage assets had been tested and they had not been. Mr Adams commented that it was striking that, in relation to assessing the heritage impact of the proposal, the Officer's report reached the exact opposite conclusions to those of Historic England, the statutory adviser on heritage matters. Historic England concluded that the proposal would degrade the public realm, hem in the buildings and streets around it, reduce sight lines and this would directly compromise an appreciation of the setting of the exceptional heritage assets and the broad experience of the City around them. The Officer's report stated that Historic England's conclusion was without foundation. This was a stark departure from the advice of the statutory body responsible for advising on the historic environment. This was a cause for concern and should give Members significant pause for thought. He urged Members to consider Historic England's advice that the base of the building should be redesigned to protect and enhance St Helen's Square and the historic environment. He added that their advice and the representations of CC Land should be given considerable weight.

Mr Justin Black, head of the UK development CC Land stated that CC Land understood the strategic importance of the One Undershaft site to the future of the City of London. They fully supported its redevelopment, but not at any cost. He stated it was understood that the applicant commenced engagement with Officers in early 2022. However, their first briefing did not occur until 18 months later on the 31 October 2023, seven weeks prior to the planning application submission. Mr Black stated that CC Land, along with other stakeholders believed these plans to be flawed, resulting in unnecessary harm to the public

realm, townscape and setting of heritage assets. He added that this harm would be irrecoverable, if progressed and was completely avoidable. Redevelopment of One Undershaft did not necessitate the loss of street level public open space and did not necessitate the demotion and the size and stature of St Helen's Square. He added that the harm created by these proposals could be averted through redesign with minimal commercial impact to the applicant.

Mr Black informed Members that as evidenced by the applicant's 2019 consent, there were other solutions. The current plans were not the only way to deliver a fully accessible St Helen's Square with more public seating. The applicant benefited from a world class professional team capable of overcoming most challenges and concerns could be resolved if the applicant redesigned the lower third of the building. Cutting back massing from the ground floor to Level 11 would remove the overhang and add back floor space consented under the 2019 scheme with a reconfiguration of the core. St Helen's Square would be protected and enhanced. Local workers could access the square for impromptu amenity and respite would be protected and enhanced. The vision for an exemplary centrepiece for the City Cluster would be achieved. The resultant loss of floor space would be less than 4%.

Mr Black commented that comprising 13% of the projected demand for office floor space in the City, the applicant's proposals could be perceived as too important not to receive approval. He stated that CC Land, along with other stakeholders, strongly believed that the One Undershaft opportunity was too important not to get absolutely right and that the redevelopment plans should be first class on all aspects.

He stated that the current proposals fell short, particularly in relation to the street level place making. The applicant's 2019 consent recognised the importance of street level public open space and the need to protect and enhance St Helen's Square. The need to preserve and enhance the limited supply of public realm in the City of London has become more acute since the 2019 consent.

The concerns detailed in the representations were not unique to CC Land and statutory bodies. The worries were widely shared by workers, residents, businesses, industries and property owners in the local area. They were legitimate concerns raised by those who would be directly affected by the One Undershaft proposals and must be fully considered and evaluated as part of the decision-making process.

Mr Black stated the Sub-Committee should refuse to endorse any loss of street level public open space to private commercial use and any demotion of the size and stature of St. Helen's Square.

Members were informed that the current form of the lower third of the building was a choice by the applicant, which could be changed and improved upon at the direction of Members and Officers. The resultant loss of floor space would be less than 4%. Mr Black stated that believing that the harm created by these

proposals was compulsory or an unacceptable price for the City of London to pay for the redevelopment of One Undershaft was a mistake that could and should be avoided. He requested that Members deferred determination of this application and that the applicant be required to progress revisions to the proposals which would deliver no loss of street level public open space compared to the existing situation and which would preserve and enhance St Helen's Square as a vitally important civic space and focus for placemaking, for workers, residents and visitors.

The Chairman stated that there were four ward Members registered to speak, Mr Dominic Christian, Ms Irem Yerdelen, Alderman Sir Charles Bowman and Deputy Henry Colthurst. A Member advised that Deputy Henry Colthurst would not be speaking.

Mr Christian stated that there had been an insurance centre in the City of London that uniquely brought together the qualities of an insurance campus, a trading area and a client services model. He stated that the London market was one of history's more resilient and enduring business operations and was almost precisely in the same location.

He stated that insurance central was not just national it was global. Spontaneity, creativity and connectivity stood at the core of the 52,000 people who worked around the square in this very area, 59 managing agents, 92 Lloyds syndicates, 250 insurance companies, over 330 insurance insurer technology companies as counting all these businesses with their 52,000 employees working within metres of each other. They had a common fascination with risk, analysing, assessing, translating and transmitting risk and much of the time they worked together on this, as members of the community respecting competition but acting as one.

Mr Christian stated that for 40 years, he had been working in the City of London, always next to and within sight of this building. He had been working as a broker throughout that time, going to Lloyds on a daily basis along with 5,000 other people, visiting the myriad of underwriting offices clustered around lawyers. He added that the City of London was an ecosystem. Buildings were not independent of each other. For the last 10 years he had been the global chairman of Aon, with 3,500 people working in the Cheese Grater building next door to this building which equated to 60% of the employees who worked in that building.

Members were informed that Mr Christian had also been the deputy chairman of Lloyd's and stated the chairman of Lloyds had made comments in the press opposing what had been proposed. Mr Christian stated Members and Officers had advised, agreed and authorised many of the fantastic buildings in EC3 and the insurance community was grateful. He listed several companies and stated the insurance community including leaders from all of the large insurance companies of the world, all of whom had bases of operations in the City were all opposed. He suggested that an estimated 40,000 out of 52,000 were opposed. The ward in which this building was proposed was Lime Street Ward

and approximately 90% of the voters worked in the insurance community, many of them for the companies he had referred to.

Mr Christian requested that the Sub-Committee defer the decision and seek further consultation. He stated that a consultation meeting had been held on 14 February but nothing had changed. He advocated for postponement and further consultation.

Ms Irem Yerdelen spoke about the open space benefits, especially from an environmental perspective and the health benefits perspective. She stated there was a significant open ground floor space in front of this building currently and it provided groundwater storage, flood control, air and water pollution abatements, recreation, habitat and ecological and aesthetic benefits. Most importantly, such open ground floor space in cities such as London mitigated the effects of pollution and could reduce the phenomenon known as the urban heat island effect, the heat trapped in built areas. There were lots of built areas around this building already and the effect should not be extended by taking away the ground floor space.

Ms Yerdelen stated that this ground floor space created solitude for herself and her team every time they stepped into that space. It helped them to reflect, to pause, to soak up the sun and simply connect with other people. This space particularly benefitted younger people and less senior people in the industry and the surrounding offices. They could eat their lunch there and connect with their colleagues. Ms Yerdelen commented that we did not inherit the earth from our ancestors; we borrowed it from our children. She stated that the open ground floor spaces should not been taken away.

Alderman Sir Charles Bowman stated that in his 11 years as Alderman of Lime Street, he had been reminded most days of the importance of the insurance sector and cluster to the City's economy and its importance to the City's future. As Lord Mayor in 2017/18, when promoting UK financial and professional services internationally, he witnessed firsthand the role that London played as the world leader in specialist and other insurance, and the admiration that the international community had for the unique insurance cluster. He also witnessed the global competitiveness within the sector and the related fragility of the City's position as market leader and the need to do the right thing to sustain that number one position.

Alderman Bowman stated he was part qualified as an architect. He had a deep admiration for Eric Parry and his work, past and present. He was a very firm believer in place-based development within the City and based on 11 years as an Alderman, believed strongly that One Undershaft should be redeveloped. However, with equal strength, he believed that the proposed building was not the right answer as designed and would damage the insurance sector. He had spoken to many in the sector, including the chairman of Lloyd's. He had also spoken to fellow elected Members who were heavily engaged in the insurance sector and in promoting the financial and professional services sector. The views from this engagement had been unanimous, that the site should be developed but not with the building as currently designed. It would damage the

sector built up. Alderman Bowman stated the preeminent insurance sector and cluster was a prized asset in the City and EC3 and there was a responsibility to listen.

The Chairman asked if Members of the Sub-Committee had any questions of the objectors.

A Member asked for clarification on the loss of space related specifically to St Helen's Square. An objector stated that the space was being reduced by 30%. The 18% reduction referred to the loss of public realm around One Undershaft, including the space to the west and to the north of the building. The objector stated their focus was on St Helen's Square and the 30% loss of what they regarded as the primary civic space and the most useful usable public open space.

A Member queried why there were not more objections from insurance companies. Mr Christian stated that at the consultation meeting on 14 February 2024, not a single member of the insurance community attending, was in favour. They objected on grounds of footprint, aesthetics, the thoroughfare, how people lived their lives and worked and the ease with which they did that. The Chairman stated that he was at the meeting, along with Officers. He was not aware that anyone at the meeting objected to the building itself or the requirement for office space and comments were in relation to security, access and the ground floor plane. Mr Christian stated that objectors were not objecting to the overall building, just elements of the scheme. They were not trying to stop the scheme but to help improve it.

A Member asked a question in relation to the floor plate at ground level and the 11th floor public realm. She stated that on the site visit, it was helpful to see the way the space was used, with people using the ground floor space to eat lunch. She asked if, with the loss of public space at ground level, the space at podium level would be used by the same people in the same way. Ms Yerdelen stated that people eating lunch and chatting in the ground floor space was the day-to-day reality. The ground floor space was evidence of the socioeconomic variety coming together every day. Office workers, construction workers and tourists all sat there. This socialising provided value in this part of the City. Ms Yerdelen stated that she was not against the building but was keen the building provided the same benefits as before. She raised concern that the 11th floor space would not be used in the same way as people were often short of time and therefore it would not be equivalent to the ground floor space.

A Member asked Mr Adams to give his assessment in planning terms of the quality of the proposed public space with the new podium level and the proposed new ground level public space, compared to the existing public space. Mr Adams stated the report on the City Cluster vision was a key report looking at public realm in the City which stated that spaces such as St Helen's Square provided the canvas for active and engaging public life to flourish and were supported by a range of social and cultural activities and events. He commented that a similar description could be applied to the 11th floor terrace. In his opinion, St Helen's Square was a blank canvas which could be designed

to the same quality as the 11th floor terrace. The square had been awaiting redevelopment for some years. He stated that he was not criticising the quality of the 11th floor terrace but was saying it was not an equivalent replacement because it required users to go into the building and take a lift up 11 storeys which presented quite a significant barrier to movement. Therefore this space had a different role. He added that St Helen's Square could achieve the same quality but be more accessible for all.

A Member asked about the difference between the ground floor space and the upper floor space, particularly in regard to the Tulip enquiry with comments made by the inspector and the Mayor for London. She asked objectors to expand on the comments and relevant case law the objector had mentioned about the difference in ground floor open space and upper-level open spaces. An objector stated his understanding of the Tulip inquiry was that one of the grounds of objection was the loss of part of the civic space that surrounded the Gherkin which was also regarded as a very important civic primary space. The conclusion of the inspector was that there was concern about the loss of ground floor space which was regarded as an important canvas for social and public life. The decision did not actually turn on that, but it was recorded as a ground of refusal. The objector considered that the purpose of the Tulip viewing platform was very different to the 11th floor terrace, which was different in design and purpose and was more of an international destination than regarded as a public space to serve the City.

A Member asked the objectors who spoke on behalf of the industry to comment on the quality of the consultation and asked them if they considered that the concerns of the industry had been reflected in the proposal. Mr Christian raised concerns but stated but this might be the fault of Members campaigning. He commented that this might not have been anything to do with how the consultation was organised or arranged but he did not know anyone in the area he worked in who supported this proposal.

A Member asked about consultation and what changes to the proposal would have satisfied the objectors. Mr Christian stated that security, access to the 11th floor and the removal of the footprint were the main issues that were clearly aired at the consultation meeting on 14 February 2024, and they remained concerns. Ms Yerdelen stated that she had an email feeding back points from the 14 February meeting to the committee Chairman and Officers. She read some of the email out and stated that there were no adverse comments made about the height or appearance of the main building which emitted a consensus that the end result should be suitably iconic to match the attractions of the Lloyd's Building and also the Gherkin. There were a number of concerns about how any development would be managed over the plus five-year build in an area which had already experienced major works during disruption for at least 15 years and resulting impact of workers in the immediate area. There were also comments made that however attractive the garden podium, it would provide little or no benefit to workers in the area and would join an increasingly crowded market of raised viewing and other areas. Ms Yerdelen stated there was a request for honesty about no security procedures being needed for raised areas and such claim was regarded with huge scepticism by

firms and workers in the area, which suffered two terrorist attacks in the early 1990s. One Undershaft was a major casualty of the first attack. There were also material worries about a huge loss of open public space at street level, which provided light and air at Lime Street and Leadenhall Street in an area which was hugely appreciated by 3,000 plus workers, particularly in the insurance sector and in summer months.

A Member stated he would have expected more objections and referred to the public realm under the Leadenhall Building which had engendered a lot of public comment. The Chairman stated the Officers could provide more detail on how the consultation was run.

The Chairman invited the applicants to speak.

Mr Andrew Highton, Stanhope, stated he was speaking on behalf of his client, Aroland, who were represented at the meeting by Mr Lim. Mr Harton thanked Officers for their input over the 18-month pre-application period, and the determination period and all their hard work in preparing their comprehensive committee report. He thanked Members for attending briefings, visiting the site, asking questions, embracing virtual reality and reading, digesting and considering the report. He stated there were three areas he wanted to cover in his introduction; -1) The current status of the project; 2) why new proposals were being brought forward; and 3) how the development was a fantastic contribution to the City and the wider London. Members were informed that Aroland acquired the site from Aviva in 2011. The same design team developed the scheme, which was approved by this committee in 2016 and granted planning consent in 2019. During this time, Aviva and their sub tenants remained in occupation until the end of April of this year and it was hoped full vacant possession would be secured by the autumn.

Mr Highton stated his client had committed funding to allow preparatory works, including deconstruction and enabling works. Stanhope were now assisting them to secure full development finance.

Mr Highton stated that he would now focus on why the new proposals had been brought forward. 12 million square feet of additional office space would be required in the Square Mile by 2040.

Stanhope's own research recently shared with the City's investment team showed 5,000,000 square feet of leases which came to an end within this period, and this did not account for new entrants to the City to meet their occupied demands or those companies who were likely to return from Canary Wharf. Buildings which had strong energy and carbon performance and a mixture of sizes of flexible floors, extensive landlord amenities and access to external spaces, were vital to meeting the occupier demand, to encourage people back into the office and attract the very best talent. Neither the existing building nor the consented scheme designed 10 years ago could deliver this.

Mr Highton stated he would now focus on how assurance could be given that this development would be amazing for the city and the capital as a whole. The

client with Stanhope's support was fully committed to making this a world class democratic development, to be enjoyed by workers, their friends and families, residents and visitors alike. The landscape was key and the team had been strengthened with SLA from Denmark who were a fantastic international designer. This building embodied the Destination City policy and no other building had come close to offering such a wealth of benefits to the workforce in the wider public.

Mr Highton informed Members that he was pleased to be able to confirm that the partnership agreement made between the client and the Museum of London had been renewed. He stated he hoped his words had demonstrated the client's commitment to the project.

Mr Eric Parry, Eric Parry Architects, stated that this was not an easy jigsaw puzzle to solve. However, it was a huge honour to be designing the city's designated crown of the cluster buildings as a whole. It had a remarkable and visionary urban concentration and it was an extraordinary grouping of buildings, many of which were of remarkable quality. It provided a setting that had both a sense of awe and intimacy.

Mr Parry stated that since designing the consented scheme 10 years ago, much had changed both physically and psychologically. The proposal was a response to the resulting opportunities. He stated that going back to 2016, 100 Leadenhall had been open for about three years and the building at 52 to 54 Lime Street was under construction. Since then, there had been the development of 40 Leadenhall and 100 Leadenhall. The sense of accumulation was very palpable and meant the response needed to take that into consideration.

Members were informed that the space was very much three dimensional. The square itself had less daylight and fell short in terms of BRE standards. The building was configured as a series of elements that were broken horizontally. There was a lightness to the base so that the buildings around it both to the northwest, east and south had interest. The building connected all the way to Liverpool Street.

Members were shown a view of the consented scheme and the proposed scheme. The proposed scheme was closer by 50m to allow for the security to be taken into account. There was a triple height space which was very generous at the bottom. To the north there was the new double height entrance opposite St Helen's Bishopsgate that would give access to the top of the building, the 72nd and 73rd floors of the London Museum's curated spaces. There was a quietness to the 11th floor garden which was a large area, and very easily accessible from the lifts at the base taking less than half a minute and it could accommodate 1000 people.

Amenity for the building would be created at the 30th and 48th floor, which was important for the office workers and uniquely there would be a sense of terraces to the middle sections of the building.

Ms Sharon Amant, Director at the London Museum stated that the museum had been involved in this project since it began in 2016 and the opportunity to curate a classroom in the sky on the 72nd floor of One Undershaft was unparalleled. It would be a significant building, the most stand out in the city. The top floors had been designed as a free learning space and this had been embedded in the scheme. The London Museum's commitment to this idea came from a scheme in Smithfield and the ambition here equalled that. The proposed scheme was about young Londoners and there was an ambition for all the young people who lived in the City by the time One Undershaft opened, an estimated 1.3 million school pupils between the ages of 5 and 17, would engage at one point during their 12 years in education with the classroom in the sky. It was anticipated that it would be a rite of passage, something they would remember and would have a positive impact. It was expected that there would be people visiting during term time as part of their education, educational visits organised by schools and family visits during the holidays and weekends.

The Chairman asked Members if they had any questions of the applicants.

A Member commented that considering the numbers of people using the open space, the current arrangements provided about 1.2 square metres per person and the new development provided 0.25 square metres per person at ground level, increasing to 0.75 square metres per person if the platform was included. He asked the applicants to comment on this. The applicant stated that external spaces had been created specifically for the occupants of the building. The building at the moment had no external space, so focused on the public use and the use by all of the external amenity. The applicants had sought to achieve the same or better amenity than the current amenity. 300 seats were proposed with 250 in the front and a further 50 in the west. Currently there were about 200 in the front and 60 in the west. The proposals would hopefully allow anyone who wanted to dwell, relax there and meet there to do so.

In relation to the representation from St Helen's, the Member asked about commitments to accept, embrace and engage with their requirements about noise including that from school children especially in quiet periods. He was conscious that they had services and other meetings, not just on Sunday mornings, but also had a very active midweek community. The Chairman stated this question could be asked of Officers.

A Member asked if the public realm would be more user friendly to people with mobility issues than the existing public realm. The applicant stated this would be the case. Currently there was stepping down and planters. The proposal would provide a clear space and accessibility had been paramount when designing the landscape and spaces.

The Chairman asked the applicant to outline the journey to the 11th floor, outlining the accessibility and ease of access. The applicant stated that when accessing the square from the south, there would be a grove of trees with a raised canopy. Hostile vehicle mitigation was incorporated into the seating. People would see through to a triple height space with a curved triple height glazed section that allowed great porosity. At heightened times of security,

security could be allowed for within that space. It was 165 square metres and so a large space. Directly in front would be the lift. There were three 17 persons to take people up to the 10th or 11th floor within 30 seconds so 1000 people could be accommodated in terms of lift movements within an hour.

Mr Rasmus Astrup, SLA, stated there would be yorkstone in the ground floor public realm, through the lobby, inside the lifts and out into the podium. The yorkstone was a historical reference and also created a shared public space.

A Member who was also a ward Member, stated that it had been good to meet some of the team at the public consultations. He queried whether the fundamental issues given in feedback had been addressed following consultation or if the changes had been minor. The applicants stated they had done as much as they could to strike a balance between all the uses so the scheme had not changed materially. Although the changes were minor, they had been made with a great deal of depth of thought and analysis.

A Member asked if the education space for the London Museum would be fitted out and how the staff would be funded. Ms Amant stated she expected the education space to be fully fitted out. The technology was yet to be confirmed as it would be a number of years before the space was constructed and could be used. It would be a highly immersive space with views of London. It would not be object rich like the museum in Smithfield. The space would sit neatly beside the new museum in Smithfield and was part of the museum's dynamic desire to become a financially sustainable organisation and the museum would look for new operating partners and new ways to make the museum economically viable.

The applicants confirmed they would fit out the viewing space and the museum classroom space. It would be a partnership between the owner of the building and the museum. The viewing space would hopefully be better than any other viewing space because it would be the tallest and was now designed to provide a 360 degree panorama.

The Member also asked if the amenity space would just be available to people working in the space. The applicants confirmed that the amenity spaces at levels 30 and 48 were double height and their garden spaces were accessible. The Member asked how translucent the Oculus would be. The applicants stated that the Oculus would be constructed of 50 millimetre laminated glass, 40 metres square.

In response to a Member's question about servicing, the applicants stated that they had committed to serve a much bigger building with the same number of vehicle movements. The maximum number of vehicle movements was not expected to be reached each day. The vehicle lifts would be located directly abutting St Mary Axe. The applicants were also willing to work cooperatively with adjoining owners to see how vehicle movements could be better managed.

A Member asked why the previous consented scheme was not constructed, and whether if granted, the proposed scheme would be constructed and what

the time limit would be. The applicants stated that the previous application was designed in 2014 when the world was different. Offices now had to work a lot harder to provide amenities for their occupiers. One size floor plates over multiple floors was not what occupiers required. The total project time would be 6-7 years. The client had secured funding for the preparatory 2-year period and was working hard to put in place funding for the development.

Members asked about toilet provision and access for the public. The applicants stated there would be public toilets at ground level. There would be further public toilets up at the public areas. The intention was that the toilet facilities would be open during the opening hours of the 11th floor garden, which were 7am - 11pm. This was based on dialogue with the police about antisocial behaviours. It was anticipated that the toilets would be closed from 11pm - 7am.

A Member asked whether there was funding in place to curate the cultural space. Ms Amant stated that from the London Museum's perspective, an internal development team was being set up to support this project. The longer-term business planning for this space would be considered by the Board and would require partnership as well as public funding. The museum had already received grant aid from the GLA and the City of London and Arts Council England, so it could be possible to reshape the proportion of money spent on Smithfield, the museum in Docklands and this museum. This would be considered as part of the financial planning in future years.

The Member also asked about the demolition strategy and for further details on recycling and reuse of materials. Mr Michael Trousdell WSP advised that the demolition process had been developed very carefully considering circular economy principles and had been included within the circular economy statement. An extensive pre-demolition audit had been developed. The client was working hard to achieve best practise, an example of which would be delivering a closed loop recycling on aluminium elements in the facade and also more broadly reusing as much as possible of the foundation and the substructure of the building for the support of the new scheme.

A Member asked questions in relation to the design of the building. The applicants stated that the profile at the top of the building was the same as it was in the consented scheme. The garden space was organic without sharp corners. It was a perambulation that allowed people to continuously move 330 metres with views to Saint Paul's. The element of cantilever was the element to the south. There was an edge around the building and from the 10th floor, the floor below the garden, it was suspended lantern-like. It stepped back and allowed transparency and sunlight at the base at these three and two storey levels of glass, so it was very porous at the bottom. The structure had 30 metre spacings, holding a 300 metre building above, like the arch of an amazing structure. These were trident in form and were closely engineered like giant redwoods holding the garden above and the area that protruded and gave a view through the Oculus of the public space as well as the space at the ground. The lantern would be of stone colour and that material continued into the soffit and had a softness.

In response to a Member's questions about the design of the building, the applicants stated that significant occupiers would struggle to fit their occupation into the floorplates in the previous scheme. Private amenity was a way of encouraging people back into the workplace. The public garden was for everyone. Private spaces were provided for companies to carry out their internal affairs. The scheme was not just a building but an urban space. Some of the decisions were taken according to biodiversity and the quality of space. Urban heat had also been considered.

There was a pause in proceedings between 11.58am and 12.25pm.

At this point, the Chairman sought approval from the Sub-Committee to continue the meeting beyond two hours from the appointed time for the start of the meeting, in accordance with Standing Order 40, and this was agreed.

A Member thanked the applicants and the Officers for their preparatory work. He asked about the evidence suggesting people would use the lifts and access the space at the 10th and 11th floors in the way outlined. The applicants stated that people would not have to walk very far to access the open space via the lifts. People would go to the podium because they could accomplish something they could not on the ground floor. The ground floor was the shared space. The 11th floor gave a new perspective of the City, yet it was still informal. People could see the historical layers and potentially sunlight and there would be no vehicles. This would be a destination and would be unique.

A Member asked if, considering the London Museum and the 60-year life cycle of the buildings, there would be funding for staff and maintaining the site. Ms Amant stated that there was a high expectation of this and the detail of the business would be considered by the museum's Board in due course. The applicants stated this would be a partnership and the applicants as the landlord representatives, would provide the funding to allow the museum to go about their business.

The Chairman suggested that the Sub-Committee now move to any questions that they might have of Officers at this stage.

The Chairman asked Officers to explain the context of the scheme in terms of expectations and the densification of the Eastern Cluster as well as the size of the ground floor plane and how the scheme fitted in with St Mary Axe.

The Director of Planning and Development stated that the biggest challenge that the City currently faced was maintaining its international position both in the City itself, in London and as the engine of the UK economy. To withstand the GLA projected employment increases up to 2040, a minimum of 1.2 million square metres of office floorspace had to be provided. The development industry suggested much more would be required. Modelling had shown 85% of that uplift would need to take place in the cluster which was a tiny area that could be walked through in 5 minutes.

Within the cluster there were limited sites. The site at One Undershaft was the biggest strategic site both in the cluster and in the City, to generate and optimise the amount of floor space needed to maintain the global position. This was the focus of the local plan, to ensure the City was competitive and able to provide the required floor space. It was estimated that in net terms, as there was an existing tall building on the site, 8.7% of the target would be achieved. The massing scenarios involved buildings which were much bigger, and had much more strategic level floor space but there was a need to strike a balance to optimise the site to its utmost. The floor space delivery of this site, was 150,000 square metres but had to be balanced with other planning considerations such as an appropriate design and the ground floor public realm. There was a reduction in the ground floor public realm as outlined in the Officer report. The reason for this was to accommodate the building and the floor space of this quantity, which at 150,000 square metres would employ almost 10,000 people. 30 lift cores were required, otherwise it would not be possible to lease the building for best in class Grade A space. The lift cores had to be accessed through reception areas to ensure the flow of workers into that area. The additional reception areas were required to manage the visitor experience, ensure it was pleasant, and also to prevent people queuing outside and into the public realm. The worst case scenario was planned for in terms of security. Baggage scanners could be provided in the space.

Members were informed that the loss of ground floor plane had to be seen within that context of optimising the ability of this site to generate floor space. The Director of Planning and Development commented that Officers had not stated that the elevated areas were comparable in terms of the ground floor plane and optimising the ground floor plane was important. The development had been amended to try to gain as much of the ground floor plane as possible whilst delivering a building which worked as a building and could be leased. This was a challenge. The elevated areas added another element and diversified the choice of experience. It was busy at ground floor level and many people would prefer to use the elevated areas.

Evidence statistics suggested that elevated areas were hugely popular with 1.5 million visitors to Fen Court, which was a similar scheme, half a million to 8 and 22 Bishopsgate in 10 months and 11 million visitors to the Sky Garden. Members were reminded that the site had to be optimised for Grade A office floor space.

The Chairman queried the size of the reimagined St Helens Square and was informed that this would be comparable in size to Guildhall Yard and would have several advantages over the existing space, notably 12 semi-mature trees where there were currently none. There would be 300 capacity seating where there was currently 260 capacity seating, and there would be a rich and inclusive space at the heart of the City.

The Chairman asked the Director of Planning and Development if the Officer advice was that effectively the market was demanding the floor plates and that the building needed the outlined set up within it, which would take up that space. He also queried if to get democratic space open to all and inviting to all,

there was a need to be using this space and whether in the view of Officers, the public space itself was being enhanced. The Director of Planning and Development stated that this was correct in terms of the strategic value of the site. The previous scheme was designed in 2014. More sustainable or electric buildings were now required as were more roof gardens and diversity of floor plates.

A Member queried if there had been a representation from the Eastern Cluster Business Improvement District. The Officer stated there had not been. There had been 14 objections in total; 8 from members of the public, 4 from building owners, 1 from a livery company and 1 from a building occupier. In response to a point of order from a Member that the Business Improvement Districts had a policy of not commenting, the Director of Planning and Development stated the BIDS often submitted representations on planning applications, often in support.

A Member queried if the actual loss of public realm on the ground floor was 735 square metres, which equated to more than half the size of Manchester Cathedral. An Officer confirmed 735 square metres of public realm on the ground floor would be lost.

The Member also asked about the average size of a pocket park. An Officer stated that the most comparable pocket park that had recently been granted permission was Friary Court.

The Member asked for clarification on the figures in the Officer report relating to carbon.

She stated that for Option 2, the total figure over the 60-year life cycle was 81,404, for Option 3 it was 238,736 and for Option 4 it was 310,847. Option 4, the option chosen at pre application stage was therefore 3.5 times approximately that of Option 2. Once Option 4 was chosen, further detailed work was done and the best estimate figure was now 405,000. The Officer confirmed these figures were correct and stated total figures would be included in future reports.

In relation to a question on air quality, an Officer stated that the air quality impact had been assessed already and there would be air quality impacts in terms of dust and NO₂ from plant. Protective works would include controls. There were also controls through the condition relating to the quality of plant that would be used in order to minimise emissions. There would be construction controls and operational controls to ensure air quality impacts were minimised.

The Member queried if the air quality impact of the construction would be greater because the Option 4 had been developed rather than the other options. The Director of Planning and Development stated it was not possible to comment on this as retrofit schemes could have high air quality impacts.

The Member asked about upfront embodied carbon. An Officer stated that the figure in the report was as it stood currently. The development would go

through a detailed design phase and the applicants had identified numerous carbon reduction opportunities through construction materials. It was likely that the carbon impact would reduce from there, but Officers required a detailed carbon assessment after the detailed design stage.

A Member asked if the EC1 BID was proactively contacted. An Officer stated it was consulted and was aware of this application.

The Member also asked Officers to clarify what further recourse there would be if the scheme was granted permission. The Director of Planning and Development stated that the GLA had already written in on what was known as stage one. Subject to the Sub-Committee granting the application, it would be then referred to stage two. It was then within their right to intervene or refer the application. From past experience he had not seen any signs that this would be the case. In that event, permission would then be issued and there would not be any further recourse.

A Member asked for assurance that any withdrawal of the elevated public spaces would come back to the Sub-Committee. The Director of Planning and Development gave this assurance.

In response to a Member's question about the loss of ground floor space and whether the provision of alternatives at higher levels was policy compliant, an Officer confirmed that it complied with the policies as a whole.

A Member stated the operational energy figures assumed a 60-year life of the building. He was not aware of any skyscrapers of this magnitude ever having been demolished. He asked Officers to comment on the importance of the operational energy and usage per square metre. An Officer stated that Option 1 had a retained and updated gas boiler heating system so the operational carbon was high over the 60 year period. Option 2 had an updated electric system but this was likely not to perform quite so well because of restrictions of the existing building in terms of the way it was constructed and the floor plates and plant location. Options 3 and 4 provided the best operational carbon performance as the floor plates were new and facades had been designed to perform at their best.

In response to a Member's question about St Mary Axe and the Section 278, an Officer stated that this was a separate legislative process. The entire stretch of St Mary Axe could be transformed in the urban realm and by the enhancements of that area.

A Member asked for guidance on the current footfall in St Helen's Square. An Officer stated that during the application process, there had been an extensive survey on pedestrian assessment which helped analyse comfort levels and ensure that they were maintained and improved wherever possible. This had shown that there would not be a significant increase in footfall levels so pedestrian comforts would be maintained and throughout different areas, improved. The space was designed to optimise pedestrian flow as well as create areas for people to dwell. The proposals for the square would be a

transformation both in terms of the physical appearance, but also in terms of permeability and the usability of that space.

MOTION: - A Member proposed that the Sub-Committee now move to vote on the recommendations.

The Chairman asked if there was a seconder and a Member seconded the proposal to move to the vote.

The Chairman ruled the motion to be premature at this juncture and stated that the Sub-Committee would finish questioning Officers as there were still new points emerging.

A Member commented that those working above the 11th floor were likely to stop off at the 11th floor for their lunch so this would take pressure off the ground floor space at peak times. He asked for clarification on the lift movements. An Officer stated that there were three lifts in the southern lobby area. The public lifts, each took 17 people. The round trip was 106 seconds to Level 11. 95 passengers could be accommodated per five minutes, and over 1000 people per hour.

A Member asked a question in relation to waste and servicing. She raised concern about the lack of information in relation to a waste, recycling and servicing strategy. An Officer stated that the waste management team had been consulted and the issue was the size of vehicle, not actually the operation. The team wanted to review the size of vehicles so this would be dealt with by condition. They had recommended a smaller vehicle be used which would increase the collection by one to three vehicles a week. The Officer confirmed that the waste and servicing vehicles would equate to 10 vehicles an hour. However, the vehicle movements and the servicing movements set out in the Officer report represented the worst-case scenario. They would be subject to consolidation as part of the servicing management strategy. The applicant had also been in discussions with the City's refuse team regarding the refuse collection and storage arrangements and this was covered by conditions.

The Member raised concern that the surveys were undertaken in summer 2023 when numbers of pedestrians were likely to be lower than at other times. An Officer confirmed that modelling had also taken place at other times. The motion modelling with TfL had been ongoing and approved in principle. As the project progressed, further modelling would be undertaken.

The Member also asked about the provision of short stay cycle parking at ground floor level. An Officer stated that 20 cycle racks were proposed at ground level.

A Member asked for reassurance that workers in the area would be able to get instant access to the elevated public spaces in the event of queues as elevated public places were popular. The Director of Planning and Development stated that lessons had been learnt from Fenn Court and this scheme embodied the

lessons learnt about getting people up to the elevated area promptly and spontaneously. There would also be no pre-booking.

In response to a Member's question about consultation, The Director of Planning and Development stated that Officers were comfortable that the consultation that had been carried out by the applicant was in line with the developer guidance note and the Statement of Community Involvement. It had been very thorough. Officers were surprised how few representations were received, in particular objections.

A Member asked what amendments were made to the proposal following 14 February consultation meeting. The Director of Planning and Development stated he was in attendance at the meeting along with the Chairman and others from within industry. It was clearly set out that those concerned should make their representations in writing and only one was received following this. The Director stated that to reduce the number of lift cores or the reception area would substantially reduce the floor space and that would mean the space could not be optimised. The applicants considered making amendments but as a reduction in floor space would have implications on this strategic scheme, they considered that the application had to be kept largely to the proposal.

MOTION: - The Chairman proposed a motion that the application be deferred, subject to the applicant considering the matters raised as part of the application this day, notably minor adjustments in relation to the ground floor public realm. He stated that there did not seem to be a major issue with the need for this building or the need for the delivery of office space on this site, from members or objectors. The issue seemed to be around minor aspects, in square footage terms, that could be defined, and by deferring, Officers could be asked to negotiate with the applicant on some of the aspects brought forward by Members.

The Chairman asked if there was a seconder and the Deputy Chairman seconded the proposal to defer the application.

In response to further Member questions, the Chairman asked the Town Clerk to confirm that Members were debating the motion and not the full application. The Town Clerk stated that Members were invited to debate the amendment put forward by the Chairman and seconded by the Deputy Chairman, specifically on the deferral and the merits therein.

A Member stated that if deferred, this application should be brought back to the Sub-Committee for further discussion at the earliest opportunity.

A Member stated he supported deferral and he considered that if St Mary Axe had zoned pedestrianisation this would overcome the 18% loss of part of St Helen's Square.

A Member stated that if the application was refused rather than deferred, the applicant could return with a revised scheme. She considered that addressing the issues the industry was asking for would not be a minor redesign.

The Director of Planning and Development stated that if deferred, when this returned to the Sub-Committee, Members could consider the scheme in its entirety. Deferral allowed the applicant to reflect on concerns that had been raised by Members in terms of the loss of part of St Helen's Square and to reconfigure the space if they wanted to. This would be a minor amendment.

A Member queried what would happen if the motion fell and the proposal was then refused. The Director of Planning and Development stated that the applicant could reflect and submit a revised scheme or alternatively they could appeal the decision.

A Member stated he would support the motion to defer. He considered that deferral would allow processes to be faster than an absolute rejection. Huge amounts of work had gone into the application and the Sub-Committee would be supporting both the developers, Officers and objectors in finding an answer.

A Member stated that she considered that major rather than minor changes were required and there should be a large consultation piece undertaken. She stated that clear feedback should be given to allow the developer to submit a completely new proposal.

A Member stated that no one had spoken in principle against this development and no one had provided a solution so he considered deferral would be appropriate.

The Chairman stated that a deferral would not be a message to the industry or the applicant that the City was not in favour of development or that densification of office space in the Eastern Cluster was not required. The motion for the application to be deferred was for the applicant to consider the matters raised as part of the discussion, notably the minor adjustments in relation to the ground floor public realm.

Having debated the motion, Members proceeded to vote on the motion.

Votes were cast as follows: IN FAVOUR – 9 votes

OPPOSED – 6 votes

There were 2 abstentions.

The motion to defer the application was therefore carried.

[Deputy Edward Lord who was not in attendance for this item and Deputy Michael Cassidy, Ian Bishop-Laggett and Deputy Henry Pollard who had left the meeting, did not vote.]

RESOLVED - That the application be deferred, subject to the applicant considering the matters raised as part of the application this day, notably minor adjustments in relation to the ground floor public realm.

The Chairman urge you the Officers to work as swiftly as possible to bring this back to the Sub-Committee.

5. **CROMWELL TOWER, BARBICAN ESTATE, LONDON, EC2 8DD**

The Chairman asked if Members had any questions of Officers.

A Member stated that the Barbican Estate already had fibre optic internet so there was no need for the antennas to serve the residents. He stated that 5G small cell infrastructure was proceeding at pace in the Square Mile as well as file transfer protocol servers (FTP), so it was hard to see a need for this technology outside the Barbican either. Given the large buildings in the City and with the line of sight requirement this would not benefit buildings in the Square Mile. The Member added that there were problematic heritage considerations with the proposal to locate the equipment on a listed building. He invited Officers to confirm whether any of these assertions were incorrect. The stated that he understood why this application had to come to the Sub-Committee but he would be supporting the Officer's recommendation to reject the application.

Seeing no further questions the Chairman moved to the vote.

The Sub-Committee proceeded to vote on the recommendations before them.

Votes were cast as follows: IN FAVOUR – 12 votes

OPPOSED – 0 votes

There were no abstentions.

The recommendations were therefore carried unanimously.

[Deputy Michael Cassidy, Ian Bishop-Laggett, Anthony Fitzpatrick, Alderman Hughes-Penney, Deputy Edward Lord, Deputy Brian Mooney, Deputy Alastair Moss, and Deputy Henry Pollard were not in attendance for this item and therefore did not vote.]

RESOLVED - That the Development Director be authorised to issue a decision notice refusing to grant planning permission for the above proposal for the following reasons:

1. No evidence of consultation with nearby schools has been submitted and the applicant has failed to certify that the proposed equipment together with the existing equipment when operational, would not exceed International Commission guidelines on non-ionising radiation protection, contrary to paragraph 121 of the National Planning Policy Framework.

2. The proposals would fail to preserve the special architectural and historic interest and setting of Cromwell Tower as part of the Barbican Estate (Grade II) and the Barbican and Golden Lane Conservation Area, causing less than substantial harm to their heritage significance as a result of direct and indirect impacts on the heritage assets. The harm would not be outweighed by public benefits. The proposal is not in accordance with London Plan Policy HC1; Local Plan Policies CS 12, DM 12.1, DM 12.3; HE1; Draft City Plan Policies S11 and HE1 and the NPPF.

3. The proposals would fail to protect and enhance views of the Barbican Towers as identified city landmarks and is not in accordance with Local Plan policy CS13 (2), emerging City Plan 2040 S13 and guidance in the Protected Views SPD.

6. **CROMWELL TOWER, BARBICAN ESTATE, LONDON, EC2 8DD - LISTED BUILDING CONSENT**

The Sub-Committee proceeded to vote on the recommendations before them.

Votes were cast as follows: IN FAVOUR – 12 votes

 OPPOSED – 0 votes

 There were no abstentions.

The recommendations were therefore carried unanimously.

[Deputy Michael Cassidy, Ian Bishop-Laggett, Anthony Fitzpatrick, Alderman Hughes-Penney, Deputy Edward Lord, Deputy Brian Mooney, Deputy Alastair Moss, and Deputy Henry Pollard were not in attendance for this item and therefore did not vote.]

RESOLVED - That the Development Director be authorised to issue a decision notice refusing to Listed Building Consent for the above proposal for the following reasons:

1. The proposals would fail to preserve the special architectural and historic interest and setting of Cromwell Tower as part of the Barbican Estate (Grade II) and the Barbican and Golden Lane Conservation Area, causing less than substantial harm to their heritage significance as a result of direct and indirect impacts on the heritage assets. The harm would not be outweighed by public benefits. The proposal is not in accordance with London Plan Policy HC1; Local Plan Policies CS 12, DM 12.1, DM 12.3; HE1; Draft City Plan Policies S11 and HE1 and the NPPF.

2. The proposals would fail to protect and enhance views of the Barbican Towers as identified city landmarks and is not in accordance with Local Plan policy CS13 (2), emerging City Plan 2040 S13 and guidance in the Protected Views SPD.

7. *** VALID PLANNING APPLICATIONS RECEIVED BY THE ENVIRONMENT DEPARTMENT**

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

RESOLVED – That the report be noted.

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

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.

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

There were no questions.

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

Alderman Susan Pearson

The Chairman stated that this would be the last meeting of Alderman Susan Pearson. He thanked her for her valuable input over her years on the Planning and Transportation Committee and Planning Applications Sub-Committee both as a Common Councillor and more recently as an Alderman.

The meeting ended at 1.31 pm

Chairman

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

Committee:	Date:
Planning Applications Sub Committee	10 th September 2024
Subject: 45 Beech Street Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.	Public
Ward: Aldersgate	For Decision
Registered No: 24/00176/FULL	Registered on: 19 February 2024
Conservation Area: No	Listed Building: No

Summary

Existing Site

The property address is 45 Beech Street, and it is known as Murray House. It is a corner property and also fronts Bridgewater Street. It is in existing use as an office (Class E).

The building is joined to Bridgewater House (on Bridgewater Street) to the north which is a residential property. To the west is Bryer Court which is also residential. The three buildings enclose a courtyard area and ramped access which leads from Bridgewater Street into the basement of the Site.

The site is not a listed building, and is not in a conservation area, however it is immediately adjacent to The Barbican Estate (GII Listed), Barbican Registered Historic Park and Garden (Grade II*), and the Barbican and Golden Lane Conservation Area.

Proposal

Planning permission is sought for the partial demolition, extension and change of use of the existing office building (Class E) to co-living accommodation (Sui Generis)- in the form of 174 private units with associated internal and external amenity spaces including communal cooking, dining and working areas, cycle storage, landscaping, servicing and other associated works.

It is proposed to demolish the top two existing stories, and plant above - equating to 957sqm (GIA). It is proposed to build four new stories equating to a total of 2,641sqm (GIA) of new floorspace. This would equate to a 1,684sqm net increase in floorspace and result in a final building comprising 6,968sqm (GIA) of co-living floorspace (Sui Generis).

Consultations

66 public Objections have been received, and these relate to issues including concerns over loss of residential amenity including: Noise and disturbance and loss of privacy resulting from external spaces, roof terrace and balconies; increased height and massing would result in overlooking and loss of daylight and sunlight.

Concerns have also been raised to the design of the proposal, in terms of its scale, and detail of the barrel vaulted roofs.

Impact to the local highway network, with regard to deliveries and residents moving in/out of the proposed development has also been raised.

Assessment Summary

Principle of Development

The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the National Planning Policy Framework, and the emerging Local Plan and considering all other material considerations.

Considering the location, the loss of this office use (Class E) is not considered to prejudice the primary business function of the City, nor would it jeopardise the future assembly and delivery of large office development sites; or introduce uses that adversely affect the existing beneficial mix of commercial uses. It has been demonstrated through viability testing and marketing that the continued use of the building as an office is not viable, and therefore the proposed change of use is acceptable in principle, in line with Policy DM1.1.

As this is a residential location, the site is suitable for the proposed co-living use (Sui Generis) in principle, in line with Policy DM21.1. The scheme has been through affordable housing viability testing in line with London Plan Policy H5 and H16, to determine the appropriate financial sum to be provided in lieu of affordable housing on site, and £8,510,568 would be secured towards off-site affordable housing if planning permission is granted. This element of the application has been subject to third party review by a financial viability consultant.

Despite some shortfalls in the provision of daylight and sunlight to the proposed scheme compared to the BRE guidance, officers consider the proposed quality of private accommodation and communal co-living facilities to be acceptable, they would provide future residents with acceptable facilities for sleeping, eating, working, relaxing and storage, in line with Policy DM21.5 of the Local Plan, HS4 of the Draft City Plan

2024, Policy H16 of the London Plan and the Large Scale Purpose Built Shared Living (LSPBSL) London Plan Guidance.

Sustainability

The proposed development would deliver a high quality, energy efficient development that is on track to achieve an “Excellent” BREEAM assessment rating, in overall compliance with London Plan policy SI 2, Local Plan policy CS15 and DM 15.5 as well as Draft City Plan 2040 policy DE1. The scheme demonstrates the implementation of various measures to reduce operational energy demand and benefits from future capacity to connect to a nearby district heating network upon completion.

The assessment of options, carried out in compliance with the Carbon Options Guidance 2023, confirmed that although the preferred proposal would result in the highest whole life-cycle carbon emissions out of the 2 options, none of the other options would be able to deliver the holistic sustainability benefits that would complement the re-development of the site into a scheme according with the residential context of the immediate surrounding area. Opportunities to maximise the reuse of deconstruction materials from the site have been identified to mitigate impacts of redevelopment. The proposal therefore would satisfy the GLA’s circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and Draft City Plan 2040 policy CE1. The building design responds well to climate change resilience by implementing natural ventilation to respond to overheating risks, saving water resources and various opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and Draft City Plan 2040 policies S14, OS1, OS2, OS3, S15, CR1, CR3.

Urban Design and Heritage:

Officers consider that the architectural design of the building would be compatible with the existing context in terms of scale and massing and be read as a well-layered piece of design, which would improve the building's contribution to the local townscape.

Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate co-living housing, which would increase housing stock and housing choice for Londoners. The proposals align with the function of the City to accommodate substantial growth in accordance with Local Plan Policies CS21: Housing, emerging City Plan 2040 Policy S3 Housing, and London Plan Policies D3 Optimising Site Capacity, D4 Delivering Good Design and H16 Large Scale Purpose Built Shared Living.

The architecture and urban design proposals comply with Local Plan Policies CS10 and DM10.1, DM19.1 emerging City Plan Policy S8, DE2, HL1, DE3, and London Plan Policy D3 and D8, paragraphs 130 and 132 of the NPPF and the City Public Realm SPD all of which require high-quality public realm and increased urban greening.

The proposal has been considered in relation to the LVMF and other Strategic Views (including the World Heritage Site). The proposal's small scale, dense urban location and distance from the WHS means that it would not appear in any of these views and therefore the relevant policies in the London and Local Plans would not be triggered.

The proposals would preserve the significance (via change in the setting) of heritage assets and any changes to the settings would not impact on the appreciation of nearby heritage assets. As such, the proposal would accord with Local Plan policies CS12 and DM12.1, emerging City Plan 2040 policies S11 and HE1, London Plan policy HC1, having accounted for and paying special regard to s.66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF policies.

Neighbouring Amenity Impacts

The proposed development has been identified as having some minor and major adverse impacts upon daylight and sunlight to surrounding residential properties, however considering the majority of adversely impacted windows are bedrooms, the existing poor daylighting factors, and the fact this is a tight knit urban environment, officers have assessed the impacts to be acceptable.

Objections relating to noise and disturbance have been considered, these would be addressed through conditions including restricting the hours of use of the proposed external amenity areas, and requiring there be no music to be heard from outside the premises, as well as with an Operational Management Plan. Officers consider the amenity impacts to be acceptable when considered on balance with the other merits of the application, in line with Policy DM21.3 of the Local Plan and HS3 of the Draft Local Plan 2024. A full list of conditions is set out in Schedule 1.

Transport and Highways

The proposed development would result in less highway activity than the existing office use. This is subject to compliance with conditions and planning obligations which are recommended, including submission of a Demolition/Construction Logistic Plan (DCLP), delivery and servicing plan and a Parking Design and Management Plan. A travel plan is recommended to be secured by Section 106 agreement. A section 278 agreement is recommended to secure the cost of public highway and public realm improvement works in the general vicinity of the site, as well as any remedial works.

A policy compliant level of cycle parking: 134 Long stay, and 12 short stay spaces, are proposed and would be secured by condition, in line with Policy T5 of the London Plan. Furthermore, officers have negotiated the provision of a single accessible parking space within the site. Other than the accessible space, the proposed development would be car-free in line with Policy T6.1 of the London Plan.

The proposal is considered acceptable in transport terms, in line with Policy DM16.1 of the Local Plan and VT1 of the Draft City Plan 2040, subject to compliance with the recommended conditions and planning obligations.

As discussed in detail and assessed in full in the following report, it is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Recommendation

- (1) That subject to the execution of the planning obligations in respect of the matters set out under the heading 'Planning Obligations', and the recommended conditions of development, the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule; and:
- (2) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990

Photographs



Image 1: View of property from Barbican Podium, to the Southeast of the site



Image 2: View of front elevation taken from Beech Street tunnel.



Image 3: View of Bridgewater Street elevation

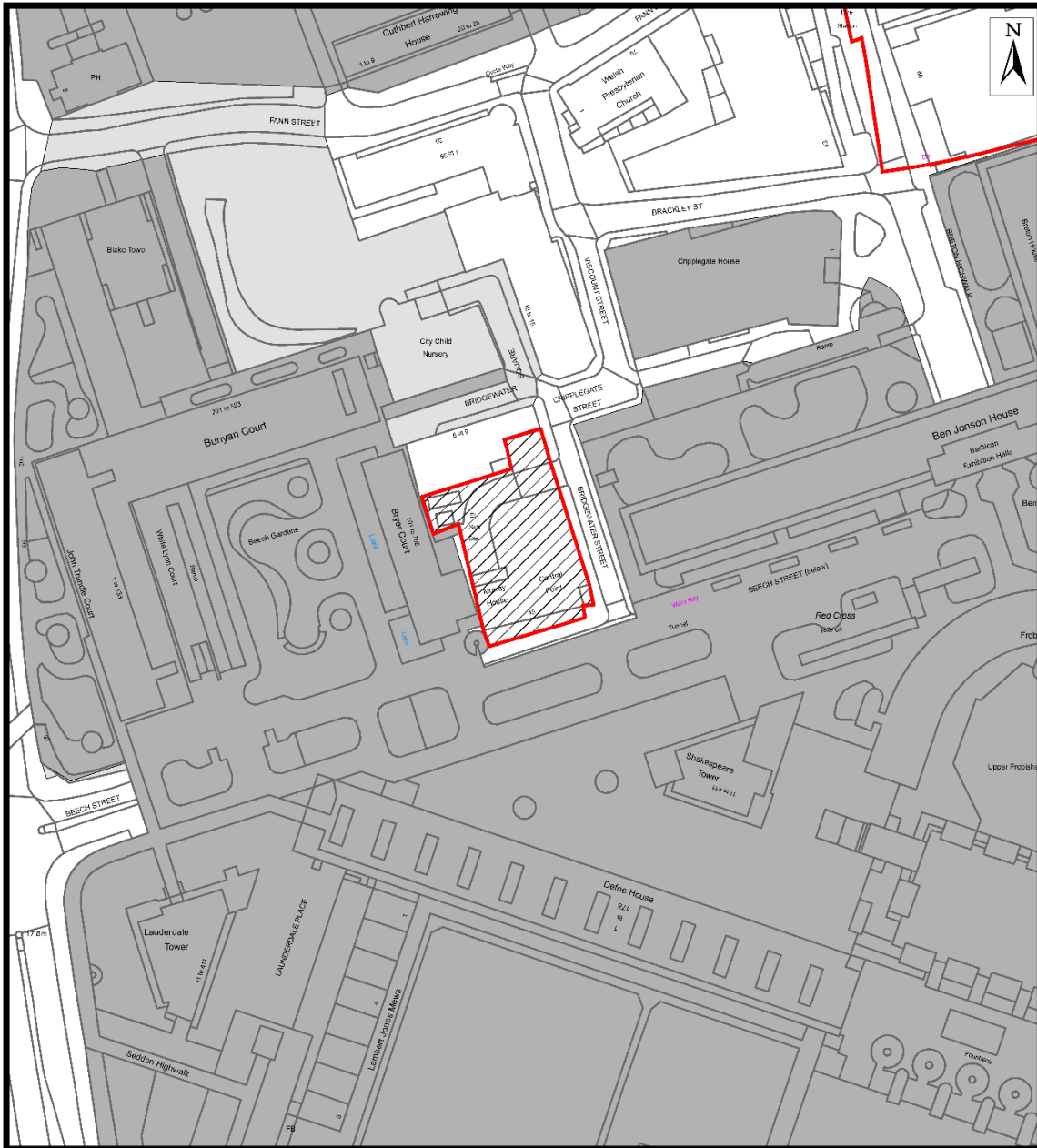


Image 4: View of westerly facing internal courtyard elevation



Image 5: View of property from Barbican Podium from the Southwest of the site.





Site Location Plan



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ADDRESS:
45 Beech Street

CASE No.
24/00176/FULL

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



ENVIRONMENT DEPARTMENT

APPLICATION COVER SHEET

45 Beech Street

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	42.36m (AOD)		50m (AOD)	
2. FLOORSPACE (SQM)	USES	EXISTING	PROPOSED	
	Office	5,284	Office	0 sqm
	Co-Living	0 sqm	Co-Living	6,968.2
	TOTAL	5,284	TOTAL	6,968.2
			TOTAL UPLIFT:	1,684.2 sqm
3. OFFICE PROVISION IN THE CAZ	N/A			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	N/A		<u>Estimated 14 Full Time Employees</u>	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	7	Car parking spaces	<u>1</u>
	Cycle long stay	25	Cycle long stay	134
	Cycle short stay		Cycle short stay	12
	Lockers	N/A	Lockers	0
	Showers	N/A	Showers	0
	Changing facilities	N/A	Changing facilities	0
6. HIGHWAY LOSS / GAIN	<u>None</u>			

7. PUBLIC REALM	The proposed entrance for the Beech Street development presents an opportunity to enhance the overall public space by incorporating additional seating, increasing greenery, and by providing a pleasant buffer zone between the road and the building. Surrounded by a stone 'mat,' the building establishes a clear boundary, offering a distinct transition as one approaches from the road and surrounding area, into a high quality public realm. Re-purposing existing stone from the current development, the proposal seeks to expand the current planters at the base of columns to provide ample space for eye-catching and large plant species to thrive, while also accommodating a more spacious seating arrangement. The introduction of rough stone seating further contributes to a naturalistic-feel within the development. It is acknowledged that these proposals fall outside of the application boundary and will be subject to agreement with the City of London	
8. HERITAGE GARDEN	N/A	
9. STREET TREES	EXISTING	<u>PROPOSED</u>
	<u>n/a</u>	<u>n/a</u>
10. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	Approximately 40	<u>16</u>
11. SERVICING HOURS	<u>To be agreed via detailed Delivery and Servicing Management Plan to be secured by condition, subject to planning.</u>	
12. VOLUME OF RETAINED FABRIC	Percentage of retained substructure by mass = 90%	
13. OPERATIONAL CARBON EMISSION SAVINGS	Improvements against Part L 2021 baseline: 13% GLA Requirement: 35%	

14. OPERATIONAL CARBON EMISSIONS

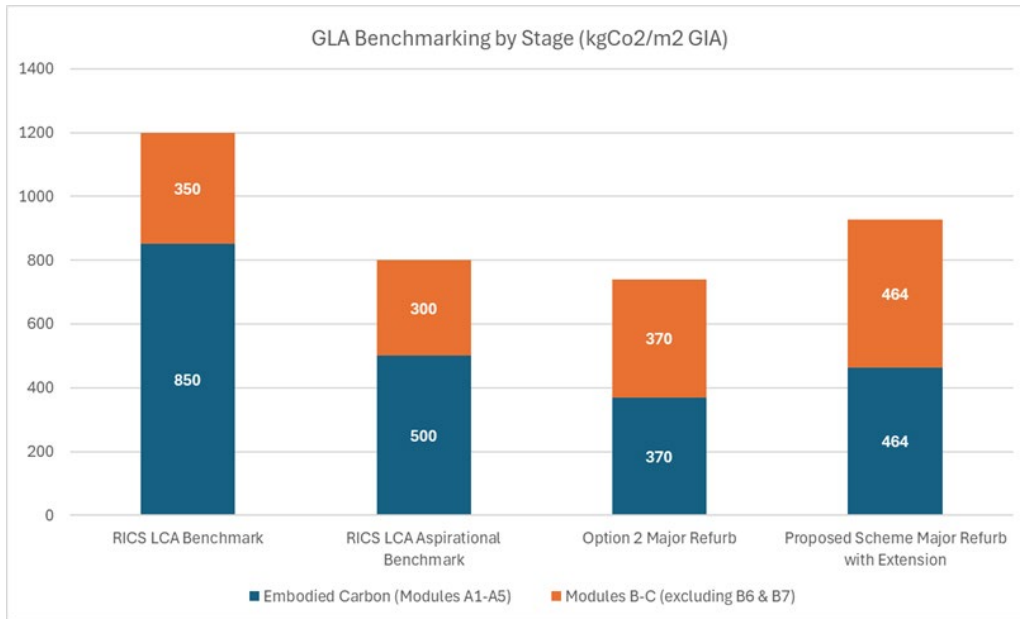
Operational Carbon Emissions

Table 5- Operational Carbon Emissions Results

Category	Totals (kgCO2e)
Operational Energy	4,285,719
Operational Water	636,340
Total	4,922,059

PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS

15. EMBODIED CARBON EMISSIONS



16. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCo2e/m2 GIA)

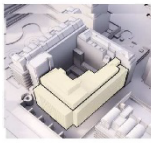
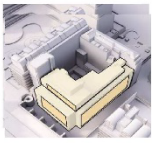

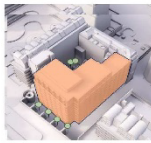
Assessment 1 – Embodied Carbon over the Life Cycle

Table 6- Assessment 1 LC Results

Module	Module Description	Totals (KgCO2e)
A1-A3	Product Stages	3,930,367
A4	Transport of Equipment and Materials	351,751
A5	Construction	490,966
B2	Maintenance	69,880
B3	Repair	17,470
B4	Replacement and Refurbishment	2,076,881
B6	Operational Energy Use (Regulated & Un)	4,285,719
B7	Operational Water in Use	636,340
C1	C1 Deconstruction / demolition	2,305
C2	Waste transport	57,115
C3	Waste processing (excl. Biogenic Carbon)	263,958
C4	Waste disposal	527
Total		12,183,279

Assessment 1 resulted in a total LCA emissions of 12,183,279 as displayed in Table 6.

The table displays the breakdown in the different life cycle modules.

17. WHO LE LIFE-CYCLE CARBON OPTIONS	Applicable	Option 1	Option 2	Option 3	Option 4
		Minor refurbishment	Major refurbishment	Major refurbishment with extension	New build
	Photo				
	Project reference period	60	60	60	60
	Gross Internal area (GIA) m ²	4,383	4,383	7,175	7,175
	Net Internal area (NIA) m ²	2,773	2,773	4,103	4,103
	Change in NIA (compared to existing) m ²	0	0	1,330	1,330
	Substructure % retained by mass	100	100	90	0
	Superstructure (Frame, Upper floor, Roof, Stairs and ramps) % retained by mass	100	100	66	0
	Superstructure (External walls, Windows and External coors) % retained by area	99	38	0	0
	Existing Building Demolition & Deconstruction (C1) [kgCO ₂ e/m ² GIA]	0	0	0.32	3.40
	Upfront Embodied Carbon (A1-A5) excl. vegetation [kgCO ₂ e/m ² GIA]	242	370	454	704
	In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7 [kgCO ₂ e/m ² GIA]	446	463	420	391
	Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) [kgCO ₂ e/m ² GIA]	688	833	884	1,095
Estimated Whole Building Operational Energy [kWh/m ² GIA per year]	162	151	101	93	
Total [kgCO ₂ e/m ² GIA]	2,176	2,280	1,175	1,902	
18. TARGET BREEM RATING	Excellent – 78%				
19. URBAN GREENING FACTOR	0.22				
20. AIR QUALITY	<p>The proposed development is ‘car-free’ so will not generate any additional traffic on the local road network. Future residents will experience acceptable air quality from existing sources. The proposed emergency diesel generator will also not have a significant impact on local air quality or the proposed development itself. During the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will be ‘not significant’; appropriate measures have been set out in this report, to be included in the Dust Management Plan for the works. Overall, the construction and operational air quality effects of 45 Beech Street are judged to be ‘not significant’. The proposed development has also been shown to meet the London Plan’s requirement that new developments are at least ‘air quality neutral’.</p>				

Main Report

Site and Surroundings

1. The application site fronts Beech Street and Bridgewater Street, and is located adjacent to the north side of the Barbican Estate. The existing building was constructed in the 1950s, prior to the Barbican Estate. It is predominantly eight stories high, with a basement level and plant at roof (ninth story) level. There is existing mobile equipment, including a mast, situated on the roof.
2. The building is joined to Bridgewater House to the north which is a residential property. To the west is Bryer Court which is also residential. The three buildings enclose a courtyard area and ramped access which leads from Bridgewater Street into the basement of the Site.
3. To the west of the Site is Ben Jonson House which sits on the opposite side of Bridgewater Street. To the south is the Beech Street highway tunnel which runs underneath the Barbican podium. The ground and first floor of the Site therefore face into the tunnel whereas the upper floors overlook the Barbican Podium.
4. The existing use of the building is as an office (Use Class E), with 5,284sqm (GIA) of office floorspace.
5. The surrounding area has a mix of uses, including The Barbican Arts Centre (Sui Generis), a mix of commercial (Class E) including offices and restaurants, drinking establishments (Sui Generis), Hotels (Class C1) and residential (Class C3). The site falls into one of the City of London designated residential areas, as defined by Policy DM21.1 of the adopted Local Plan.
6. The site is not itself a listed building, nor a “non-designated heritage asset”, and it is not within a conservation area, though it is adjacent to the following heritage assets:
 - The Barbican Estate (Grade II listed.)
 - Barbican Estate Registered Historic Park and Garden (RPG) (Grade II*)
 - Barbican and Golden Lane Conservation Area
7. There are no other designations or constraints relevant to the Site or the proposals.

Site Planning History

8. A planning performance agreement (PPA) was entered into in July 2023 between The City of London and Beech Street Ltd. (the applicant). A series of meetings were held until December 2023, and officers worked closely with the applicant team to discuss and progress the scheme. Officers have also

worked closely with the applicant team from submission and validation of the application through to the determination to ensure internal and external consultation replies were responded to and addressed.

9. The planning records below represent those most relevant to the proposed development:
10. 21/00561/DPAR Prior Approval given on 24 August 2021: Upgrade of an existing telecommunications base station, comprising of the mounting of 3 no. existing antennas and removal and replacement of 3 no. antennas on 3 no. replacement antenna support poles (2 no. 6m tall poles to a height of 32.5m and 1 no. 5.2m tall pole to a height of 32.0m), supporting 4 no. antennas at 32.5m to top and 2 no. antennas at 30.0m to top and mounting of a GPS module on the top of one of the support poles; the siting of one new rooftop cabinet and relocation of 1 no. existing rooftop cabinet and ancillary works.
11. 1698B - Erection of a 7-storey block of offices at 43, 43a & 44/46 Barbican & 2/8 (inc.) Bridgewater Street

Neighbouring Planning history:

6-9 Bridgewater Square:

12. 1725Q Granted on 4 March 1997: Use of all upper floors for residential Class C3 purposes (19 units) and part ground floor for A1 retail use with remainder to be ancillary to residential above. Addition of new seventh floor, extension and alterations to sixth floor and new fenestration of rear elevation and ground floor front elevation. New entrance to front elevation. (Amendment to planning permission 96-1725P dated 08/11/96).
13. 1725R Granted on 25 November 1997: Change of use of basement and part ground floor from offices (Class B1) to restaurant (Class A3).

Current Proposals

14. Planning permission is sought for the partial demolition, extension and change of use of the existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.
15. It is proposed to demolish the top two existing stories, and plant above - equating to 957sqm (GIA). It is proposed to build four new stories equating to a total of 2,641sqm (GIA) of new floorspace. This would equate to a 1,684sqm

increase in floorspace and result in a final building comprising 6,968sqm (GIA) of co-living floorspace (Sui Generis).

16. 174 Co-living private units, with en-suite shower rooms and kitchenettes would be provided. Communal areas proposed include a kitchen and dining room, two co-working rooms, reception and a cafe at ground level, and a gym, a laundry room and a TV room in the basement. A communal roof terrace is also proposed at 9th floor level.
17. There would be one accessible parking space provided on-site, within the courtyard area. 134 long cycle spaces, and 12 short stay spaces are proposed.

Consultation **Statement of Community Involvement**

18. The applicant has submitted a Statement of Community Involvement prepared by London Communications Agency (February 2024). Engagement on the proposals was primarily conducted in two phases between June and October 2023.
19. Phase 1 included early briefings and introductory letters sent by email to key stakeholders including ward member and representatives of key local groups, which aimed to introduce the Applicant and the Site and invited members to an early briefing on the scheme and the Applicant's vision. A briefing with local ward members was subsequently held on 24 July 2023, and a workshop for local representatives was on 02 June 2023.
20. Following its initial briefings with local representatives and resident groups in June and July 2023, in phase 2 of the public consultation the applicant undertook wider engagement around its detailed design proposal for the site in September 2023. A follow up public workshop was held with local resident groups on 15th September 2023, attended by 8 representatives. A Ward member preview event was held on 27th September 2023, attended by 3 ward members.
21. Two in-person public exhibition events were held on Thursday 28th September 2023, and Saturday 30th September 2023, attended by a total of 69 attendees.
22. Furthermore, as part of the community engagement, the applicant has circulated a double sided A4 newsletter introducing the project and applicant team, which was sent to 2553 addresses surrounding the site on 6th September 2023. A consultation website was launched in-line with the

newsletter A freephone line and email address have been set up to allow the community to contact the applicant team.

23. Feedback from the community engagement included:
- Concerns raised towards daylight and sunlight impact to neighbours
 - Comments / concerns surrounding the design and height of the proposed facade and extension
 - Robust management of the development would be important to alleviate any noise and disturbance concerns, transport and traffic impacts
 - Construction impact concern
 - Clarity over the proposed co-living use and affordability
 - Concern raised and suggestions regarding the proposed design and materials
 - Support shown for proposed cafe and co-working facilities

Statutory Consultation

24. As part of the current application, the City of London Corporation acting as the Local Planning Authority ('LPA') has undertaken consultation with neighbouring residents and other stakeholders in line with statutory duties.
25. Barbican Association: Objection - Support the addition of much needed housing in the City, but raise concerns over a number of issues with regard to loss of residential amenity including: Noise and disturbance and loss of privacy resulting from external spaces, roof terrace and balconies; increased height and massing would result in overlooking and loss of daylight and sunlight. Request that restrictions on the timing and uses of the communal external spaces be applied.
26. Barbican and Golden Lane Resident Association: Objection - The loss of day and sunlight due to too much height at the northern end of the redevelopment. The size/scale of the barrel vault roofs which are disproportionate and over-dominant in the context of the Barbican's listed status. The lack of external amenity and the potential for excessive noise pollution from the roof terrace. Occupancy and 3 month minimum terms, should be enforced.
27. Barbican and Golden Lane Neighbourhood Forum: Objection - Support the principle of the conversion of the office block to a co-living scheme, however raised the following concerns: The loss of day and sunlight due to too much height at the northern end of the redevelopment. The size/scale of the barrel vault roofs which are disproportionate and over-dominant in the context of the Barbican's listed status. The lack of external amenity and the potential for

excessive noise pollution from the roof terrace. Occupancy and minimum terms.

28. Ben Johnson House Group: Objection – Height, mass, loss of sunlight and daylight and other amenity impacts. Inappropriate design (barrel vaulted roof). Noise and disturbance from additional residents and other activity, co-working/cafe, terrace, events, courtyard and private balconies. No. of residents should be controlled by condition (i.e. single occupancy only). Delivery and servicing impacts. Existing levels of pollution on Beech Street would be exacerbated. Impact on local services (i.e. open space and doctor surgeries).
29. Historic England: Did not wish to comment
30. Gardens Trust: Commented that they had some concerns about the effect of the height and massing of the proposed development on the significance of The Barbican Registered Park and Gardens. Also noted that the proposed additional residents would add pressure on the capacity of the gardens.
31. Health and Safety Executive: No Objections, content with the fire safety design as set out in the project description. However, some matters were identified, that the applicant should try to address, in advance of later regulatory stages.
32. Thames Water: No Objections, subject to conditions relating to submission of details of Infrastructure/network upgrades, no building within 5m and 3m of strategic and water mains respectively.
33. Environmental Health: No objections, subject to conditions relating to hours of use of external areas, restrictions on amplified/live music, restricted servicing hours, restrictions on plant noise, construction scheme of protective works, sound insulation for co-living units, cooking extract details and lighting strategy details.
34. Lead Local Flood Authority: Recommended conditions requiring full details of the proposed SUDS strategy to be submitted and approved by the Local Authority.
35. City of London Waste Division: No Objections
36. Neighbour letters were sent to 977 surrounding residential properties on 5 March 2024; site notices were posted on 29 February 2024, and the applications were advertised via the weekly list and notice in City AM on 27 March 2024, and in the 'weekly list'.

37. Following submission of amendments, surrounding residents were re-consulted on 6th August 2024.
38. In response to the consultations 66 objections have been received in total. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of representations received is set out in the table below. These are summarised into key ‘themes’ of objection and include some direct quotes from representations received, as well as officers’ response to the comments.

Representation Themes (Objection)	Example comment(s)	Officers’ response / paragraph(s) where addressed
Co-Living Use	<p><i>This is not the place for temporary accommodation for people who will be renting the properties.</i></p> <p><i>We object to co-living, since there is no proven need for short term accommodation, rather the area and London as a whole needs permanent housing of a mixed type and tenure including affordable homes.</i></p> <p><i>Tiny studios, the inadequate cooking facilities, and the general overcrowding suggest a short-term housing idea, not long-term decent homes.</i></p> <p><i>It is intended for transient people who will contribute little to the social fabric of the area and may contribute greatly to reducing quality of life for many permanent residents.</i></p> <p><i>Suggestion there should be 3 month minimum tenancies.</i></p> <p><i>The building will be used 24 hours a day 365 days a year and there will be constant hubbub generally much greater than in a simple block of flats. It will be suitable for a younger demographic who are more inclined to socialise and make additional noise to older demographics (this is not a criticism). Potentially it will create a buzzing</i></p>	<p>Co-living is supported in this location in principle, it is a form of housing, contributing to The City’s Housing targets, including a contribution towards affordable housing. See Principle of Development section of report.</p> <p>The quality of the proposed accommodation has been assessed to be acceptable in line with the relevant policies and guidance.</p> <p>3 month minimum tenancies would be secured as an obligation in the Section 106 agreement and as part of the Operational Management Plan.</p>

	<p><i>atmosphere around the building with constant movement all hours of the day and night. A complete change from the quiet atmosphere at present.</i></p>	<p>Officers are satisfied there would be no unreasonable impact resulting from noise and disturbance, subject to recommended conditions. See Amenity section of this report.</p>
Design	<p><i>The scheme is poorly designed and insensitive to the Barbican estate listed building, conservation area and heritage setting, in particular the pastiche barrel roofs.</i></p> <p><i>The building is too large, too high, one storey should be removed to ensure the building is subsidiary to the power blocks on either side.</i></p> <p><i>The scale and massing is too large for this infill site.</i></p> <p><i>As its new upper floors thrust forward from the previous building line, and beyond the line of its neighbours, they will appear much more dominant.</i></p> <p><i>The south facade is not aligned with the Barbican.</i></p> <p><i>The design's blandness obscures its role in the creeping degradation of the Barbican's setting.</i></p> <p><i>The proposed continuously sprung vaults of the 45 Beech street proposal create a bulky high level massing which is crude and out of proportion with the adjacent terraces.</i></p>	<p>Design officers have concluded the proposed design to be compatible with the existing context in terms of scale and massing and be read as a well-layered piece of design, which would improve the building's contribution to the local townscape. See Design and Architecture section of this report.</p>
Amenity	<p><i>The height of the proposed building will have an adverse impact on residential</i></p>	<p>Officers have assessed the amenity impacts to be acceptable overall –</p>

	<p><i>amenity including views, loss of daylight and sunlight light and loss of privacy.</i></p> <p><i>The significant increase in the height of the building will inevitably cause both yet more shading nearby and yet more wind turbulence.</i></p>	<p>see Amenity section of the report.</p> <p>The additional 2 stories would not be expected to require testing with regards to wind.</p>
<p>Noise and Disturbance</p>	<p><i>Potential for noise pollution from the proposed outdoor spaces/ terrace/ balconies.</i></p> <p><i>We object to suggested informal use of the courtyard, the noise already bounces right up through the space, and risks being a nuisance to existing residents.</i></p> <p><i>The opening windows of the flats also present a risk of noise and disturbance.</i></p> <p><i>According to the proposal, the development is mainly aimed at young professionals working in the City of London and surrounding areas on a relatively short term basis. Consequently, it is unlikely that they will have the same level of consideration for Barbican residents as do those already living in the Barbican Estate. Any noisy behaviours on the new balconies and on the roof terraces would be very detrimental to Barbican residents.</i></p> <p><i>Possibility for live events and amplified music at the site (external and internal amenity spaces).</i></p>	<p>The outdoor spaces cannot be used between 10pm and 7am on any day of the week as a condition of development. Furthermore, music would be prohibited in the outdoor amenity areas and this is recommended as a condition of development.</p> <p>Noise from inside residential units is unlikely to be a concern, as this is a residential area and the units are single occupancy.</p> <p>The management will be responsible for ensuring any disturbance resulting from the use of external spaces and the property generally is quickly dealt with. A full co-living operational management plan is to be secured by section 106 agreement.</p>

		<p>It would be a condition of development that no live or recorded music shall be played at such a level that it can be heard outside the premises or within any residential or other premises in the building.</p> <p>Environmental health officers would investigate any breaches.</p>
Privacy	<p><i>Will create a significant loss of privacy to the residents opposite who would be in the direct sightlines of both residential windows and a new high-level terracing.</i></p> <p><i>The additional height, with the change from office to housing, will regrettably result in a loss of privacy.</i></p>	<p>Officers assess there would be no unreasonable loss of privacy resulting from the proposed extension or change of use to co-living. See the Privacy sub-section of the Amenity section.</p>
Daylight and Sunlight	<p><i>Building further storeys will remove the light from our flat and most of the others in the front of the Cobalt Building making them less pleasant to live in.</i></p> <p><i>We wish to object to this application on the grounds of a reduction in daylight and sunlight.</i></p> <p><i>The western side of Breton House already suffers a loss of afternoon/ evening sunlight - and heat - from the additional height of Clarendon Court over Bernard Morgan House while awaiting a similar fate from 1 Golden Lane. The above evidence confirms that extra floors have a significant effect on residential amenity.</i></p>	<p>Officers' full assessment is set out in Daylight and Sunlight Sub-section of Amenity section of this report.</p>
Transport and servicing impacts	<p><i>Traffic and disturbance resulting from frequent moving in and out of residents</i></p> <p><i>Additional traffic from comings and goings and delivery and servicing activity, are proposed facilities adequate?</i></p>	<p>Transport Statement trip generation assessment suggests reduction in movements compared to office use.</p>

	<p><i>We would question how the new flats will be adequately serviced. This, too, would generate traffic in the tunnel during otherwise quiet times and would mean further disturbance.</i></p>	<p>Condition recommended for no overnight or Sunday servicing to protect amenity of residents.</p> <p>Delivery and servicing plan to be secured by condition.</p>
Construction Impacts	<p><i>Construction noise - no Saturday working must be enforced and how is this to be controlled?</i></p> <p><i>working hours must be limited to 9am - 5pm Monday to Friday and the developer must put up</i></p> <p><i>acoustic barriers to block noise / vibration during the refurb</i></p> <p><i>Additional construction traffic, road closures etc.</i></p>	<p>Construction Management Plan to be secured by condition. See Transport and Highways section of this report.</p>
Sustainability	<p><i>The unnecessary additional embodied carbon in the proposed roof, as opposed to a flat one, as well as other sustainability issues needs to be addressed. If the Climate Action Strategy has any relevance, the proposed roof must be rejected</i></p>	<p>The overall whole life-cycle carbon emission impact of the development is considered to be acceptable. See sustainability section. The roof design is considered to be acceptable. See design and heritage section.</p>
Other	<p><i>There is a very high likelihood of anti social behaviour affecting the Barbican estate.</i></p>	<p>New residential development in a residential area is not considered to be a source of anti-social behaviour by officers. Notwithstanding, the draft Operational Management sets out how anti-social behaviour is to be managed, and a full co-living operational management plan to be secured by section 106 agreement.</p>

Air Quality	<i>Not opposed to this redevelopment in principle, but the inclusion of a tall flue for emergency generator exhaust raises some concern.</i>	Plans have been submitted showing the location of the generator flue, this is 1m above the roof level and not located close to any air intakes, and the air quality officer considers this to be acceptable. A condition is also recommended requiring additional information to be submitted for approval with regards to the generator.
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Policy Context

39. 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.
40. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation in Spring 2024. It is anticipated that the City Plan will be submitted to the Secretary of State shortly. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are listed in Appendix B to this report.
41. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.
42. 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.
43. The Mayor of London’s Large Scale Purpose Built Shared Living (LSPBSL) Guidance document provides direction and recommended benchmarks for the design and assessment of all applications with LSPBSL (also known as co-living).

44. Relevant City Corporation Guidance and SPDs includes the Barbican and Golden Lane Conservation Area Appraisal (City of London, 2022) and Barbican Listed Building Management Guidelines Vol. II (City of London, 2012).

Considerations

45. The Corporation, in determining the planning application has the following main statutory duties:-
- 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 material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
46. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (Section 66(1) Planning (Listed Buildings and Conservation Areas) Act 1990). This duty must be given considerable weight and importance when weighing any harm to the setting of a listed building in the balance with other material considerations.
47. The National Planning Policy Framework (NPPF) states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.
48. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social, and environmental.
49. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
- a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- (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.

50. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
 - a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
51. Chapter 5 of the NPPF seeks to deliver a sufficient supply of new homes. Paragraph 60 states it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community. Paragraph 62 states that housing uplift should generally be accommodated within cities and urban centres themselves, based upon a housing needs assessment.
52. Chapter 6 of the NPPF seeks to build a strong, competitive economy. Paragraph 85 states decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
53. Chapter 8 of the NPPF seeks to promote healthy, inclusive, and safe places.
54. Chapter 12 of the NPPF seeks to achieve well designed places. It advises that "The creation of high quality 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."

55. It goes on to set out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive and 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.
56. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment, it 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.
57. It goes on to advise, "In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness."

Main Considerations

58. In considering the application for planning permission account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
59. The principal considerations in this case are:
- The extent to which the proposals comply with the development plan
 - The extent to which the proposals comply with the NPPF
 - The principle of the loss of existing office (Class E) space
 - The principle of providing co-living (sui generis) residential
 - The impact of the development in design and heritage terms (including indirect) to the setting of the special architectural and historic interest and heritage significance of the Barbican Estate.
 - The impact of the proposal in terms of energy and sustainability

- The impact of the proposed development on the amenity of residential occupiers, both within and adjacent to the proposed development with regards noise, access to daylight and sunlight, and general amenity.
- The transport and highway impacts of the proposal
- Consideration towards impacts upon Human Rights and Equality

Principle of the loss of office

60. London Plan Policies E1 and SD4 support the increase in office floorspace and the internationally significant office functions of the Central Activities Zone (CAZ). Core Strategic Policy CS1 'Offices' of the Local Plan and Strategic Policy S4 'Offices' of the draft City Plan seek to ensure that the City provides additional office accommodation to meet demand from long term employment growth. Local Plan Policy DM1.1 'Protection of office accommodation' and draft City Plan Policy OF2 'Protection of existing office floorspace' seek to protect office accommodation.
61. Loss of office floorspace is generally resisted when the site is considered suitable for long-term viable office use, in accordance with the Local Plan Policy DM1.1 and the [Office Use Supplementary Planning Document](#) (SPD).
62. The Office Use SPD and, in particular paragraphs 28 and 29, set out the information requirements to justify the loss of office. In order to be able to fully assess and establish whether the loss of office space would be acceptable, the following evidence must accompany an application:
- marketing of the building for office use;
 - valuation of the building in its current use, establishing an Existing Use Value;
 - viability appraisals of the building to demonstrate the longer term unviability for continued office use (the assessment should also consider the viability of refurbished office space and a refurbished office space including extension of the building to match the building envelope of the proposed co-living use).
63. The applicant has submitted a financial viability assessment (DS2, dated January 2024). The report considered three scenarios: 1. Light refurbishment only, 2. Category A refurbishment including improved sustainability, and 3. Demolition of existing building and construction of a new office building, reflecting the same overall building envelope as the Proposed Development of a co-living scheme.

64. The Financial Viability Assessment concludes that both refurbishment scenarios and the new build scenario result in deficits when compared to their Benchmark Land Value.
65. Acting as independent third-party reviewer, BNP Paribas have appraised the assumptions and conclusions of the submitted financial viability assessment in their Review of Financial Viability Assessment (BNP, March 2024) and carried out their own analysis. They have adopted the majority of assumptions, which are agreed, and their own assumptions where they are not in agreement. Most significantly, they have identified significant flaws in DS2's Benchmark Land Value (BLV) and have therefore adopted a nil Benchmark Land Value.
66. Based upon BNPs own assumptions, the appraisals result in a surplus for all three scenarios: £7.61mil for Scenario 1, £0.3mil for Scenario 2, and £1.98mil for Scenario 3.
67. However, BNP have also undertaken IRR analysis which calculates the rate of return over an assumed hold period. This is reasonable as arguably a zero BLV is more reflective of the intentions of the Planning Practice Guidance, as the site value should reflect existing use value, which in this case is low or zero, given the lack of office demand for the building, set out in the marketing details submitted.
68. This results in an IRR of 8.18% for Scenario 1, 8.26% for Scenario 2 and 8.30% for Scenario 3, which are all below the level of return an investor would consider reasonable for the investment. The results conclude that the refurbishment of the existing building as offices generates a return which is considerably lower than what is an acceptable market benchmark. In addition, a new build office development would also result in a lower than acceptable level.
69. There are constraints of the existing building which limit its commercial desirability for continued office use and officers consider the building is not likely to be capable of being redeveloped either partially or wholly to provide the high-quality office space currently needed.
70. The findings of the City of London Corporation Future of Office Use report (Knight Frank, Arup) support the argument set out in the applicant's viability report which recognised the current trend of investment in the highest class of Grade A or above offices. It concluded that the projections for higher office demand up to 2040 "do not account for the challenges faced by some existing lower grade stock in the City", and suggested, "that intervention is needed to

allow for fewer obstacles for older stock to be updated to meet office market needs, or to convert to other uses”.

71. Turning to marketing requirements as set out within the City of London Office Use SPD, the FVA includes marketing information and evidence within its appendices. This information comprises a schedule of competing serviced offices within a ½ mile radius of the site, a schedule of vacant office space within a ½ mile radius of the site, and a table detailing vacancy rates at the site over a 58-month period prior to submission of the application. Overall, this information demonstrates that in the specific context of 45 Beech Street there are competing office spaces nearby and a significant amount of available vacant floorspace in the nearby area, as well as demonstrating that the site has suffered from falling occupancy and increasing vacancy across the 58-month period detailed within the relevant appendix. This position is then supported by the FVA and its conclusion that the building cannot viably continue to be used as office floorspace into the future.

Loss of Office Summary

72. In light of the submitted FVA, as independently reviewed by BNP, the proposed loss of the office is therefore considered acceptable, as it has been demonstrated that there is no realistic prospect of continued long-term office use of the site.
73. Due to this, and considering the location, the loss of this office use is not considered to prejudice the primary business function of the City, nor would it jeopardise the future assembly and delivery of large office development sites; nor introduce uses that adversely affect the existing beneficial mix of commercial uses.

Proposed Co-Living Housing (Sui Generis)

74. Strategic Policy CS21 of the adopted Local Plan supports refusing new housing where it would prejudice the primary business function of the City or be contrary to Policy DM 1.1 (Protection of Office Accommodation). In this case as it has been demonstrated that the existing office building cannot viably continue in office use, and that in this location the proposed co-living housing would not prejudice the primary business function of the city.
75. Co-living, also referred to as Large-Scale Purpose-Built Shared Living (LSPBSL) is a form of non-self contained housing, generally made up of at least 50 private individual rooms together with communal shared spaces and facilities. This type of accommodation is seen as providing an alternative to

traditional flat shares and includes additional services and facilities, such as room cleaning, bed linen services, on-site gym facilities and concierge service.

76. The use of Co-Living is not defined as C1 (hotels), C2 (residential institutions), nor C3 (self-contained housing) as it is distinct from those uses. It is therefore a Sui Generis use class.
77. Policy DM 21.1 Location of new housing states: New housing should be located on suitable sites in or near identified residential areas. Within these areas a mix of appropriate residential and commercial uses will be permitted; and that new housing will only be permitted where development would not:
 - prejudice the primary business function of the City;
 - be contrary to policy DM 1.1;
 - inhibit the development potential or business activity in neighbouring commercial buildings and sites; and
 - result in poor residential amenity within existing and proposed development, including excessive noise or disturbance.
78. Strategic Policy S3: Housing of the draft City Plan 2040, which now has some limited weight, encourages additional housing on appropriate sites in or near identified residential areas, prioritising the delivery of affordable housing, **co-living**, build to rent, hostels, sheltered and extra-care housing, while recognising that for sale market housing would be likely in some instances to have a role to play in making housing development viable.
79. New housing should be refused where this would protect the business function of the City or where such proposals would be contrary to Policy OF2, or result in poor residential amenity within either the existing or proposed development, including excessive noise or disturbance.
80. The site is within a designated residential area as identified in the adopted Local Plan. There are a relatively large number of existing residential properties surrounding the site, and therefore the site is considered to be suitable for the proposed co-living residential use in principle.
81. London Plan Policy H16(A) states Large-scale purpose-built shared living development must meet the following criteria:
 - (1) it is of good quality and design;
 - (2) it contributes towards mixed and inclusive neighbourhoods;
 - (3) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency;

- (4) it is under single management;
 - (5) its units are all for rent with minimum tenancy lengths of no less than three months;
 - (6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:
 - a) convenient access to a communal kitchen
 - b) outside communal amenity space (roof terrace and/or garden)
 - c) internal communal amenity space (dining rooms, lounges)
 - d) laundry and drying facilities
 - e) a concierge
 - f) bedding and linen changing and/or room cleaning services;
 - (7) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes;
 - (8) a management plan is provided with the application.
82. As concluded in the Architecture and Public Realm Design section later in this report, the proposal is considered to positively integrate with its surroundings, ensuring good-quality design, and in turn contributing positively to mixed and inclusive neighbourhoods and the proposed Co-Living development is considered to be well designed in line with H16 (1 and 2).
83. The location is considered suitable, and the proposal would contribute to mixed and inclusive neighbourhoods in this existing predominantly residential area of The City in line with H16(2). There are no other co-living developments within the immediate vicinity, so the proposal would not result in an over-concentration of this kind of housing.
84. Having a PTAL of 6b, the site is one of the best connected in London, and it would not contribute to car dependency in line with (3) as the only parking provided would be for disabled residents. Furthermore, due to the location and type of housing proposed, it is considered unlikely residents would own a vehicle. A clause in the Section 106 agreement would prohibit any future resident (other than disabled residents) from securing a residential parking permit.
85. The site would be under the single management of the applicant, a single operator, in line with (4). The submitted planning statement (in line with 8) confirms that tenancy lengths would be no less than 3 months, and this minimum tenancy length would be secured within the Section 106 agreement, in line with (5).
86. Communal facilities are provided in line with (6) and the private rooms are of an acceptable quality in line with (7), as assessed in the following sub-section.

87. A draft Operational Management Plan (HubCap, February 2024) has been submitted in line with (8). This sets out high level details of how the development would be managed, including measures to control the potential for residents to generate unreasonable levels of noise which could result in harmful disturbance to neighbouring residents. The final management plan would be secured as part of the Section 106 agreement.
88. The London Plan recognises that co-living schemes count towards meeting housing targets on the basis of a 1.8:1 ratio, with 1.8 co-living bedrooms/units being counted as a single conventional home. This approach to monitoring net housing provision from different forms of non-self-contained accommodation is based on the amount of self-contained housing this form of supply would expect to free up.
89. The Proposed Development is therefore equivalent to 97 conventional homes, which makes a substantial contribution to the City of London's housing supply targets.

Quality of private accommodation and communal facilities

90. As noted above, Policy H16 states co-living, or Large Scale Purpose Built Shared Living (LSPBSL), proposals are required to be of good quality and design, communal facilities must be sufficient, and private units must provide adequate functional living space with appropriate layout, and must not be self-contained homes. There are currently no minimum space standards for communal and private areas of this type of accommodation. Given the generally small size of the private space in these developments, the communal amenity spaces are important elements in ensuring that the quality of the overall residential amenity is acceptable.
91. In February 2024, the Mayor of London adopted the Large Scale Purpose Built Shared Living London Plan Guidance (LSPBSL LPG), and officers note that this was adopted very soon after submission of the current application. This document provides additional guidance to LPAs and developers on the design quality of this type of housing.
92. As a minimum, communal facilities should enable all residents to cook; prepare and eat meals; relax and socialise, including with guests; work from home and; do laundry. Table 3.3 of the LSPBSL LPG sets out the required and optional types of internal communal facilities that should be included in LSPBSL development. Recommended benchmarks for communal indoor space provision, and for the design of kitchens, dining spaces, laundry facilities, living rooms, lounges and workspaces, are also set out in the table below.

93. The LPG states that recommended benchmarks are based on current best practice of operating LSPBSL developments. Some flexibility in the assessment of LSPBSL applications against these recommended benchmarks may be applied to the design, scale and provision of these facilities in consideration of the site's location and context, or other scheme-specific factors where it is demonstrated that qualitatively good design outcomes are being achieved.
94. Communal areas should be inclusive; well designed; adequately sized; well ventilated; conveniently accessed; and sufficient to meet the requirements of the anticipated number of residents and should allow for flexible use to give residents a sense of autonomy and community. Provision of some public (non-resident) access to elements of the communal facilities is encouraged, to promote integration of the LSPBSL with the local area. Facilities open to the public may count towards resident communal space requirements where they are integrated within the building; managed by the operator; and accessible to residents at least 12 hours a day, six days a week.

Daylight and sunlight to the communal areas

95. The proposed development is over 11 stories, including Basement, Ground and Levels 1-9. The proposed basement would provide an equipment gym, and a smaller gym studio; a laundry room with direct access to the courtyard external amenity space; a TV room; and storage space. It would also contain the bicycle parking and refuse store, as well plant.
96. The Laundry room would be naturally lit with a glazed door and window facing west into the courtyard and four rooflights. The gym would also be served by several windows and a glazed door. It is considered acceptable for the TV room to not be served by any windows, as dark conditions are often required for a TV/cinema room.
97. The proposed ground floor would provide the shared kitchen, a resident co-working space, a public and resident cafe/lounge and Co-Working Lounge either side of the main reception area (which would be open to residents at all times and to the public only during certain hours or for events); Main entrance and reception, 4 toilets including 1 accessible WC.
98. The proposed kitchen would be served by three large windows facing onto Bridgewater Street (East) and the cafe/lounge by four large windows facing onto Bridgewater Street, and Beech Street. The Co-Working reception and Lounge would have 2 large windows facing onto Beech Street, and the Residents Co-Working area would be served by a large array of windows,

spanning the full curvature of the internal courtyard wall at ground level. The private dining and multi-purpose rooms would also be served by large windows.

99. The proposed external amenity areas are located on the roof at 9th floor level, and at ground floor level within the existing courtyard, which will be terraced and landscaped.
100. An assessment of daylight and sunlight to the proposed accommodation (Anstey Horne, February 2024), has been submitted, and this has been independently reviewed by BRE in their report dated 12 July 2024. A selection of communal areas and habitable rooms in the scheme have been included in the Anstey Horne assessment. These include two co-working areas, a dining room and kitchen on the ground floor and a total of 96 of the studios on the first, third, fifth, seventh and ninth floors.
101. The assessment for sunlight provision has been carried out by Anstey Horne using the recommended methodology. The communal roof level amenity space was also assessed for sunlight provision using the recommended methodology.
102. None of the ground floor communal spaces would meet the daylight provision targets used in the assessment. This is due to the deep plan layout proposed for these spaces and, to some extent to the inherently limited daylight availability to proposed windows that face into the courtyard. Daylight levels are considered reasonable in areas closest to windows, but these spaces taken as a whole would not receive adequate daylighting, when compare to the BRE Guidance, and reliance on artificial lighting would be required, particularly in areas away from windows.
103. BRE suggest that for a proposed open space to be well sunlit at least 50% of its area should be able to receive at least two hours of sunlight on 21 March. The assessment results suggest that 63% of the area of the roof terrace amenity space would be able to receive at least two hours of sunlight on 21 March, compared to the 50% target, thus meeting the BRE guideline.
104. The courtyard external space has not been tested, however, due to the existing built form around this space, it is unlikely to receive any significant hours of direct sunlight, and therefore the quality of this space would be poor in this regard. However, as the proposal is for conversion and extension of an existing building, opportunities to provide additional external space in an alternative location are limited. The area of roofspace proposed as roof terrace, is likely the only acceptable location, due to amenity considerations.

105. When considering the results of the assessment, the constraints associated with the conversion and extension of an existing building on a tight-knit urban site must be taken into account.
106. In this case there is limited scope for the adjustment of the orientation, size and position of the windows. It is also worth noting that the building was originally built for office/commercial use and therefore daylight availability would not have been a key design consideration. Although the BRE guidance gives numerical guidelines, these are intended to be applied flexibly since natural lighting is only one of many factors in site layout design. Where higher density development is desirable there cannot be the same expectation of light as in a suburban or rural context. Furthermore, the Mayor of London's Draft Interim Housing Supplementary Planning Guidance emphasises that fully optimising housing potential may necessitate departure from conventional guidelines whilst still achieving satisfactory levels of residential amenity.
107. Whilst the BRE Guidance in terms of daylight and sunlight would not be met for the majority of the proposed communal spaces, this can be attributed to existing levels of daylight within the building and courtyard which are already limited due to the existing built form and surrounding context. The retention and reuse of the building as a form of housing is a planning merit to which significant weight is given by officers and officers consider therefore, that the provision of natural light to the proposed communal areas is considered acceptable in this case.

Size and layout of communal facilities

108. The breakdown of the different communal areas proposed by area is in the table below.

Area / facility (Required or Optional)	Included in total communal space requirement (Y/N)	Min. Recommendation / Benchmark	Proposal
Total internal amenity space (174 residents) (R)	N/A	622sqm	690 Sqm (485sqm at ground floor level and 205sqm at basement level)

Kitchen (R)	Y	87sqm, 12 cooking stations.	Approx 100sqm combined kitchen and dining area, 12 cooking stations
Dining (R)	Y	26 spaces	26 spaces included in communal kitchen area Approx 100sqm combined kitchen and dining area
Laundry (R)	Y	5 washers and 5 dryers	9 washers and 9 dryers (stacked) 24.9 Sqm
Living Room / Lounges (R)	Y	No recommended minimum	75 Sqm Café 69.3 Sqm Combined Public Lounge and Co- working space 97 Sqm Combined Residents Lounge and Co-working space
Other (O)	Y	N/A	35.3 Sqm Entrance 11.7 Sqm Reception 22.7 Sqm Multi-purpose room 1 19 Sqm Multi-purpose room 2 85.5 Sqm Gym 27.9 Sqm Gym studio 47.7 Sqm TV Room
Workspace (O)	Y	N/A	69.3 Sqm Combined Public Lounge and Co- working space 97 Sqm Combined Residents Lounge and Co-working space
Toilets (R)	N	N/A	3.5 Sqm Accessible WC ground floor 16.3 Sqm Toilets ground floor 3.2 Sqm Accessible WC basement

Personal Storage (O)	N	N/A	There are two stores in the basement. Function and area distribution to be determined. 13.2 Sqm store basement (behind lift core) 2.6 Sqm store basement (by TV Room)
External amenity (R)	N	174	137.2 Sqm Communal courtyard 65.2 Sqm Communal roof terrace Total Shared external amenity space for residents 202.4 Sqm
Circulation Space (R)	N	N/A	79 sqm lower ground floor circulation 62 sqm ground floor circulation 107 sqm typical floor circulation
Spaces incurring additional cost (O)	N	N/A	No spaces incurring additional cost for residents to use.
Cafe / Restaurant (open to public) (O)	Y conditionally	N/A	75 Sqm Café
Management Storage (O)	N	N/A	There are two stores in the basement. Function and area distribution to be determined. 13.2 Sqm store basement (behind lift core) 2.6 Sqm store basement (by TV Room)
Cycle Storage (R)	N	131 long stay spaces 5 Short stay spaces	134 long stay spaces 12 Short stay spaces 146 spaces in total

Car Parking	N	Car-Free subject to Policy T6.1(E)	1 accessible space on-site.
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109. The proposed co-living development would provide sufficient communal facilities for future residents, as demonstrated by the table above.
110. The proposed cooking, dining, laundry, communal living and working spaces individually and in total exceed the minimum areas recommended in the LSPBSL LPG. The proposed layouts are considered to be acceptable, and would provide functional and high quality communal living spaces to future residents.
111. The proposed facilities are suitably inclusive and accessible, and this is discussed further in the Accessibility sub-section of the Architecture, Urban Design and Public Realm section of this report.
112. The proposed external amenity areas, in total exceeds the minimum requirement, and are of an acceptable quality. Final details of landscaping are recommended to be reserved by condition, to ensure the spaces are high quality, and contribute to urban greening.

Assessment of Private Units Quality

113. Policy H16 (7) requires that the private units are not self-contained homes, nor capable of being used as self-contained homes, but provide functional living space. The units should be suitably sized to accommodate the amenities for sleeping, eating, working, relaxing and storage. They should be no less than 18 sqm, and no more than 27 sqm, to avoid them being used as substandard self-contained units.
114. Private units should be designed to receive adequate levels of daylight, sunlight, ventilation, outlook and privacy, and must be protected from internal and external sources of noise, to ensure good-quality living conditions.
115. To meet the requirement of London Plan Policy D5, schemes should provide 10 per cent accessible units. Accessible units are generally expected to be between 28 and 37sqm.
116. A number of different layouts are proposed in the development, but the floor areas are either 20sqm or 21sqm for each of the 6 standard room types. The floor to ceiling heights are 2.5m. This is in line with the guidance set out in the LSPBSL LPG, and therefore the room sizes are considered to be acceptable.

However, none of these rooms are considered large enough for occupation by couples, and therefore each room shall only be allowed to have a single tenant, and this would be an obligation within the Section 106 agreement.

117. Objections have been received relating to guests having visitors stay, but officers feel this would be reasonable usage of one's home. The draft Operational Management Plan sets out how management would deal with noise and disturbance, and this is considered the appropriate way to deal with any issues should they arise in the future.
118. 10% of the rooms are proposed as accessible (17), and these would either be 28sqm or 36sqm. The proposed accessible units are suitably inclusive and accessible with regard to their layouts and the layout of the wider building, and this is discussed in full in the Architecture, Urban Design and Public Realm section of this report. The accessible units would be prioritised for disabled residents and there must not be a rental premium for disabled residents inhabiting these units. Details of management and allocation are to be secured in the Operational Management Plan of the Section 106 agreement.
119. Each of the proposed room layouts include a double bed, a bedside cabinet, a wardrobe, a desk, a kitchenette and an en-suite shower room, in line with Table 3.5 of the LSPBSL LPG. As each of the proposed units would be provided with larger than the minimum floor areas, and each of the facilities recommended by the LPG, the proposed layout is suitable to provide adequate facilities for sleeping, eating, working, relaxing and storage to future residents and are acceptable, in line with Policy H16.

Daylight and sunlight to the private units

120. All private units would be provided with at least one window, and the majority are of single aspect. The submitted daylight and sunlight assessment (Anstey Horne, February 2024) assessed daylight and sunlight to roughly a 50% a sample of habitable rooms from ground to ninth floor levels in the proposed development. Although not all proposed studios have been included in the assessment, the results provided give a reasonable indication of daylight provision levels that can be achieved throughout the entire proposed development.
121. The results for daylight provision to studios as presented in the Anstey Horne assessment are as follows:
 - 43 of 96 studios analysed (or 45%) would meet the kitchen target (200 lux over half of the area and half of annual daylight hours)

- 53 of 96 studios analysed (or 55%) would meet the living-room target (150 lux over half of the area and half of annual daylight hours)

122. The proposed studios are generally more likely to meet the daylight provision recommendations than the communal areas (assessed above) as they are on upper floors and many are facing south towards the Barbican Podium where there are fewer obstructions.
123. Some level of obstruction to daylight is experienced by proposed studios facing west towards Ben Jonson House, particularly on lower floors, whilst proposed studios facing into the courtyard are most heavily obstructed, as expected. Some of these units on lower floors would have a poor provision of daylight, whilst similar units would not be able to meet the recommendations even on the seventh floor.
124. Overall the provision of natural daylight and sunlight to the development is considered to be mediocre. Officers consider this provision to be acceptable, due to the existing built form and context, which is a tight-knit urban grain, with many courtyard facing windows. The existing building is being largely retained, and therefore the opportunity to increase levels of daylight and sunlight into the building through orientation and size of windows is limited. Furthermore, due to the nature of the proposed private units, which are expected to be small and for single occupancy, they are generally only served by one window on a single elevation, limiting levels of daylight that could be achieved, depending on the orientation.
125. On balance, officers consider the provision of daylight to the private co-living units to be acceptable, in line with Policy H16 of the London Plan, and adopted guidance.

Summary for quality of proposed accommodation and communal facilities

126. Overall the provision of communal facilities in terms of size and layouts to be provided are considered acceptable, and good quality facilities would be provided to future residents. The proposed private units would also provide acceptable layouts and room sizes, as well as suitable facilities for day-to-day living.
127. The provision of daylight and sunlight is considered to be mediocre overall, and some of the private units, and most of the communal areas would fall below the guideline levels set out in the BRE Guidance. However, officers consider this to be acceptable in this case, due to the existing context and conditions, which is a tight-knit urban grain, with many courtyard facing windows. The existing building is being largely retained and reused as a form

of housing, which is a planning merit given a great level of weight by officers, and due to this the opportunity to increase levels of daylight and sunlight to the building through orientation and positioning of windows is limited.

128. Officers therefore consider the proposed quality of accommodation to be acceptable, and in line with Policy H16 of the London Plan, and the LSPBSL LPG.

Affordable Housing

129. Policy H4 Delivering affordable housing sets a strategic target of 50% of all new homes to be delivered as genuinely affordable and requires major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach (Policy H5 Threshold approach to applications).
130. Policy H5 *Threshold approach to applications* of the London Plan sets the initial threshold level of affordable housing on gross residential development at 35% to be delivered as affordable housing.
131. This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application:
- 1) the borough, and where relevant the Mayor, should scrutinise the viability information to ascertain the maximum level of affordable housing using the methodology and assumptions set out in this Plan and the Affordable Housing and Viability SPG
 - 2) viability tested schemes will be subject to:
 - a) an Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough)
 - b) a Late Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or a period agreed by the borough)
 - c) Mid Term Reviews prior to implementation of phases for larger phased schemes.
132. Where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and undertaken in line with the Mayor's Affordable Housing and Viability SPG.
133. LSPBSL generally provides accommodation for single-person households who cannot, or choose not to, live in self-contained homes or HMOs. This accommodation type may be used on a transitional basis until residents find

suitable longer-term housing. Whilst LSPBSL provides an additional housing option for some people, due to the unique offer of this accommodation type it does not meet minimum housing standards and is therefore not considered to meet the ongoing needs of households in London.

134. For this reason, LSPBSL cannot be considered an affordable housing product. It does not provide accommodation suitable for households in need of genuinely affordable housing, including families.
135. Parts (9) and (10) of London Plan Policy H16 therefore require development to:
 - 9) deliver a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an: a) upfront cash in lieu payment to the local authority, or b) in perpetuity annual payment to the local authority.
 - 10) In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the units to be provided at a discount of 50 per cent of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy H5 Threshold approach to applications.
136. In Line with Policy H5 and H16, the applicant has submitted a Payment in Lieu of Affordable Housing letter (DS2, November 2023). The Proposed Development is for the change of use of existing offices with extensions to provide 174 co-living units with ancillary amenity spaces over basement and ten storeys at ground level and above.
137. DS2 have undertaken an appraisal of the Proposed Development assuming 35% of shared-living units are provided as affordable and a second appraisal assuming that 100% of units are provided as private housing. They have arrived at a calculation of the £5.9 million payment in lieu of affordable housing provision by deducting one residual value away from the other.
138. In order to determine whether a scheme is viable with a given percentage of affordable housing, alongside other planning obligations and community benefits, the key question is whether the residual land value is sufficient to incentivise the landowner to bring the site forward for development. The Planning Practice Guidance ('PPG') indicates that a 'benchmark land value' should be established on the basis of the existing use value of a site plus a premium for the landowner. The premium should "provide a reasonable incentive, in comparison with other options available, for the landowner to sell the land for development while allowing a sufficient contribution to fully comply with policy requirements".

139. The PPG recognises that landowners may also be able to develop their land for an alternative type of development to that proposed in their application. As an alternative to existing use value, paragraph 017 of the PPG indicates that benchmark land value may be informed by the values generated by alternative uses, providing that the alternative scheme would “fully comply with up to date development plan policies.... and... it can be demonstrated there is market demand for that use”.
140. Furthermore, if an alternative use value approach is adopted, the PPG indicates that “AUV includes the premium to the landowner. If evidence of AUV is being considered the premium to the landowner must not be double counted”.
141. The City sought an independent review of the appraisals, and BNP Paribas carried this out.
142. The exercise carried out by the applicant and BNP differs from the methodology above, as the purpose of the calculation is to identify the uplift in value to the Applicant that would result from not providing 35% affordable housing on-site. Rather than comparing the residual land value generated by the Proposed Development to an existing use value, it is compared instead to a ‘counterfactual’ scheme, which provides affordable housing onsite. The payment in lieu equates to the difference between the two residual land values.
143. DS2’s initial appraisal report (November 2023) indicates that the Proposed Development generates a payment in lieu equating to £5.9 million. DS2 arrive at this payment in lieu by deducting the residual value generated by the Proposed Development (assuming 100% private housing) from a residual appraisal assuming a notional provision of 35% of units at 50% discounts to market rent.
144. BNP have stated in their review (March 2024) that the approach DS2 have adopted is consistent with guidance and practice for the purposes of calculating payments in lieu of affordable housing. BNP identified some issues with the inputs into DS2’s appraisals, including the projected rents, co-living operating costs and removed irrecoverable VAT from the equation. As a result of changing these inputs, BNP’s independent assessment indicated that the payment in lieu should increase to £13.59 million.
145. DS2 responded with a letter (17 May 2024). In this letter they noted that BNP’s appraisals were structured with a residualised ‘output’ rather than as a residual land valuations, which resulted in no finance costs being applied to land value. BNP in their response letter dated 7 June 2024 agree that this

was at odds with the methodology outlined in the City's Planning Obligations SPD, so have restructured their appraisals to generate residual land values.

146. The higher weekly rents projected by BNP in their review, which increases co-living market rents from £475 to £525 per week has been accepted by the applicant team and applied in an amended appraisal. The applicant has also accepted the removal of the irrecoverable VAT. As a result of BNP's restructured appraisal and including the amended operating costs and assumed market rents the payment in lieu represents the difference between the two residual values, being £8,510,568.
147. The applicant has agreed to pay this sum, which reflects the full financial equivalent of provision of 35% affordable housing in accordance with London Plan policy H16. This figure is arrived at by deducting the residual value of the scheme with 35% affordable housing (£7,009,906) from the residual value of the scheme delivered as 100% private housing (£15,520,474). It will be secured through the Section 106 Agreement as an up-front payment. In light of the proposed affordable housing payment, the proposal is considered to comply with Policy H16 of the London Plan, with regard to affordable housing.
148. An Early Stage Viability Review, if an agreed level of progress on implementation is not made within two years of the permission being granted. A Late-Stage Review is not required, as a payment in lieu equivalent to 35% affordable housing would be provided in line with Policy H5 of the London Plan.
149. The proposal would provide 174 co-living housing units (equivalent to 97 conventional housing units), which contributes to the City of London's annual housing targets, within a largely retained existing building. A significant sum would be secured in lieu of provision of affordable housing on site to be put towards City led (or involved) affordable housing schemes off-site, and these are planning merits to which a high level of weight is given by officers.

Principle of development conclusion

150. Considering the location, the loss of this office use (Class E) is not considered to prejudice the primary business function of the City, nor would it jeopardise the future assembly and delivery of large office development sites; or introduce uses that adversely affect the existing beneficial mix of commercial uses. It has been demonstrated that the continued use of the building as an office is not viable, and therefore the proposed change of use is acceptable in principle, in line with Policy DM1.1.

151. As this is a residential location, the site is suitable for the proposed co-living use (Sui Generis) in principle, in line with Policy DM21.1. The scheme would contribute to The City's housing targets (equivalent to 97 conventional housing units) and housing choice for Londoners. It has been through viability testing in line with London Plan Policy H5 and H16, to determine the appropriate financial sum to be provided in lieu of affordable housing on site, and £8,510,568 would be secured if planning permission is granted, in line with Policy H5 and H16 of the London Plan.
152. Despite some shortfalls in the provision of daylight and sunlight to the proposed scheme compared to the BRE guidance, officers consider the proposed quality of private accommodation and communal co-living facilities to be acceptable and of a good quality, they would provide residents adequate facilities for sleeping, eating, working, relaxing and storage to future residents, in line with Policy H16 of the London Plan.
153. Subject to assessment of the following matters, the proposal is acceptable in principle.

Sustainability

Circular Economy

154. 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.
155. The existing 45 Beech Street site comprises a part 6-part-8 storey building constructed in 1956. The building was originally constructed with a stone facade and inset spandrel bands of rendered concrete and ribbon glazing, which was replaced approximately 22 years ago. The building's structure is formed of a reinforced concrete basement and ground floor slab. The superstructure is formed of a steel frame encased in concrete. The floor slabs are concrete ribs with hollowpot infill. There is a lower ground floor which is accessed via an external ramp that curves inside the privately owned courtyard. Structural slab to structural slab level heights vary on each floor, ranging from 2.23m to 2.94m.
156. In assessing the existing building's suitability for the proposed uses, several factors have been considered. These include the lack of demand for office space at 45 Beech Street in its current form, and the unsuitability of the

existing floor-to-ceiling heights on the 5th, 6th and 7th floors which do not meet the 2.5m minimum headroom requirement for residential units.

157. A pre-demolition audit was undertaken which included the consideration of major refurbishment, and major refurbishment with extension. Although the option of a minor refurbishment for co-living residential use (Option 1) was also explored at an early stage, the aforementioned constraints relating to ceiling heights, in addition to poor facade and M&E performance meant that this option was discarded at an early stage. The option of a total demolition and new build (Option 4) for co-living residential use was also discarded at an early stage due to the high levels of carbon emissions associated with demolition and the sourcing of new materials, in addition to the opportunities that exist for the retention of various elements of the existing building. As such, the focus of the optioneering exercise centred on the following options which both of which proposed the conversion of the building for co-living residential use:

- Option 2: Major refurbishment, 100% of substructure, 100% of superstructure, and 38% of facades retained.
- Option 3: Major refurbishment with extension to upper floors, 90% of substructure, 66% of superstructure and 0% of facades retained.

158. Option 2 would not involve much demolition and would comprise a retrofit with partial retention of the existing facades. However, it would not address the main shortcomings of the building including its failure to meet minimum headroom requirements, poor thermal performance, and non-compliant staircases.

159. Option 3 would involve a retention of the structure up to the existing 5th floor, the demolition of the existing 6th and 7th floors, and an extension of the building by an additional two storeys. New high-performance facades would be introduced, in addition to new lift and stairs to meet current building standards. This option would address existing compliance and regulation issues whilst improving the thermal performance of the building ensuring its suitability for residential uses. As such, this option has been chosen for the planning submission.

160. The submitted Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions into the chosen option, in accordance with the GLA Circular Economy Guidance. The statement includes details to support the reuse of existing materials, in addition to identifying an efficient materials strategy for all new elements, to include:

- Retention of 90% of the substructure (by mass), 66% of the superstructure (by mass), and 0% of the façade (by m²). New facades are considered to be essential to improve the building's energy conservation standards and thermal efficiency which are underperforming.
- Identification of reuse opportunities for deconstruction materials in accordance with the value retention hierarchy.

- Adoption of the GLA Building in Layers strategy with associated features such as a unitised façade system to enable replaceability and disassembly throughout the lifetime of the building.
 - The exploration of material exchange platforms as an option for donating or selling materials.
 - The re-use of re-purposed stone from the cladding of the existing building to create planters and seating.
161. A pre-demolition audit has been undertaken identifying the types and quantities of key materials present in the existing building whilst exploring on-site and off-site opportunities for reuse and recycling. This includes confirmation of a commitment to achieving key GLA targets including the re-use and recycling of 95% of non-contaminated construction and demolition waste, a minimum of 20% of the building materials to be comprised of reused or recycled content, and a minimum of 65% recycling rate for operational waste by 2030.
162. Confirmation of the proposed measures and identified opportunities through an update to the Circular Economy Statement and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved are required by condition.

Operational energy strategy and carbon emissions

163. The Energy Statement accompanying the planning application demonstrates that the proposed development has been designed to achieve a site-wide overall 12% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building.
164. Energy demand and the risk of overheating would be reduced by including the following design measures:
- Naturally ventilated co-living studios featuring openable windows to increase occupant comfort.
 - Efficient lighting and dimming to reduce internal gain.
 - High solar control glazing to reduce solar gains in addition to external shading in the form of a canopy at the top floor
 - Mechanical Ventilation Heat Recovery (MVHR) units to reduce cooling demand.
 - Efficient building envelope, enhanced fabric airtightness to reduce heating demand and infiltration heat losses.
165. The site is located within close proximity to an existing district heat network. Confirmation has been provided of the network's ability to accommodate the development's peak heating and cooling loads and as such the building will be connected to provide space heating, cooling and domestic hot water.
166. Low and renewable energy technologies are proposed to the development and comprise of a rooftop mounted PV array of 35sqm which would provide renewable energy.

Energy use intensity (EUI)

167. It is noteworthy to mention that the GLA does not currently provide carbon emissions targets and benchmarks specific to co-living spaces. As such in relation to EUI and space heating demand, the proposed development is assessed in relation to the requirements for all other non-residential developments as outlined in 7.13 of the GLA Energy Assessment Guidance.
168. In regard to carbon emissions savings beyond Part L, the scheme is assessed in accordance with the targets for non-residential development in accordance with 9.2.7 of the London Plan 2021.
169. 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 all other non-residential buildings, the GLA targets an ambitious EUI of 55 kWh/m²(GIA)/year and a space heating demand of 15 kWh/m²(GIA)/year. The estimated EUI from the proposed development is 41.1kWh/m²/year inclusive of a space heating demand of 10.4 kWh/m²/year. These values are based on speculative allowances that will be reviewed in further detail to provide more accurate estimations in the next stages.
170. The site-wide energy strategy does not meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme. Often a sizable reduction in carbon emissions is seen at the Be Clean stage where the actual efficiency of the proposed energy systems is compared to those used for the notional building. However, since the development will be connected to an existing heat network that is currently only partially decarbonised (with a decarbonisation plan in place), the benefit of connecting to a heat network is not properly captured since the notional and proposed buildings are assessed with the same system emissions and primary energy factors, in accordance with the NCM and GLA energy modelling guidance. As such, notwithstanding the merits of the heat network connection, the carbon emission reductions at Be Clean stage are shown as 0%. The proposed PV array would generate 1,994kWh of electricity annually which would result in a carbon emission saving of 0.1 tCO₂/year equivalent to a saving of 0.2% which is rounded down to 0% in the GLA's reporting spreadsheet.
171. A Section 106 obligation will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM and other certifications

172. A BREEAM New Construction 2018 pre-assessments has been undertaken for the development targeting a rating of 'Excellent' with a potential for 'Outstanding'.
173. The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution and Materials as well as the Climate Adaptation credit Wst05 in the Waste category.
174. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2040 Policy DE1. Post construction BREEAM assessments are required by condition.
175. The scheme seeks to achieve an EPC rating of A.

Whole life cycle carbon emissions

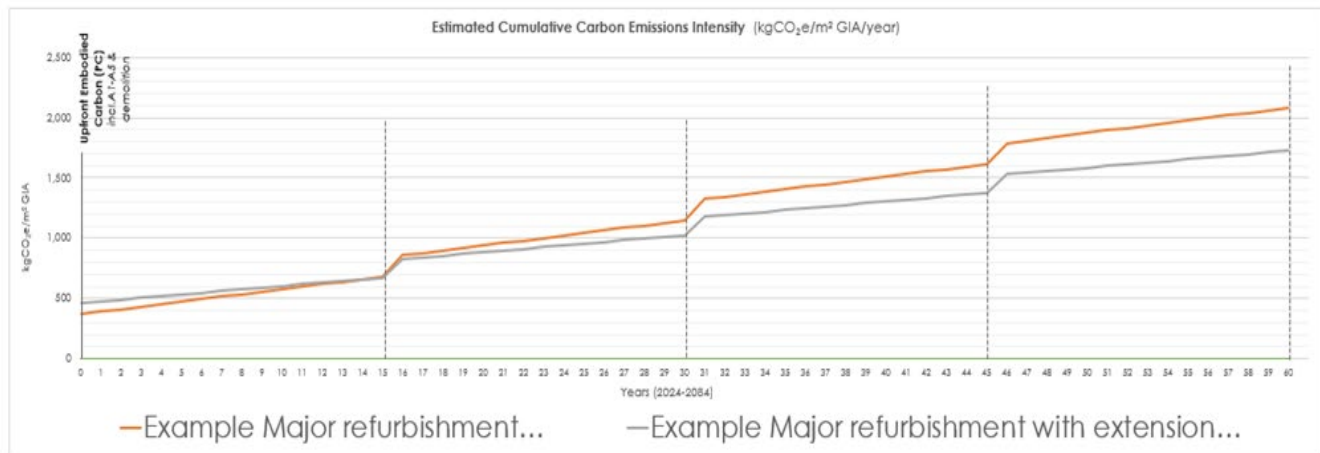
176. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.

Carbon Options

177. The following options were chosen as described in the Circular Economy section to be fully assessed and evaluated:
 - Option 2: Major refurbishment, 100% of substructure, 100% of superstructure, and 38% of facades retained.
 - Option 3: Major refurbishment with extension to upper floors, 90% of substructure, 66% of superstructure and 0% of facades retained, and the demolition of the existing 6th and 7th floor and the addition of 2 additional floors.

178. The following table and graph present the whole life-cycle carbon results from the 2 options:

Applicable	Option 2	Option 3
	Major refurbishment	Major refurbishment with extension
Photo		
Project reference period	60	60
Gross Internal area (GIA) m ²	4,383	7,175
Net Internal area (NIA) m ²	2,773	4,103
Change in NIA (compared to existing) m ²	0	1,330
Substructure % retained by mass	100	90
Superstructure (Frame, Upper floors, Roof, Stairs and ramps) % retained by mass	100	66
Superstructure (External walls, Windows and External doors) % retained by area	38	0
Existing Building Demolition & Deconstruction (C1) (kgCO ₂ e/m ² GIA)	0	0.32
Upfront Embodied Carbon (A1-A5) excl. sequestration (kgCO ₂ e/m ² GIA)	370	464
In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7 (kgCO ₂ e/m ² GIA)	463	420
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO₂e/m² GIA)	833	884
Estimated Whole Building Operational Energy (kWh/m ² GIA per year)	151	101



179. The results show that, based on new building services installations, both options' carbon emissions rise at a similar rate throughout a 60-year life cycle, and that the upfront and whole life-cycle carbon impact is higher with more

new build quantity (Option 3). Qualitatively, the options can be assessed as follows:

180. Though the retention of 100% of the existing superstructure proposed by Option 2 would help to contribute to a lower upfront carbon impact, the existing low slab heights and varying floor to ceiling heights from level 05 upwards would not be able to provide the minimum headroom requirements for residential use. Similarly, although the partial façade retention would include some improvements to operational energy performance through replacement glazing, the proposed replacement and instatement of continuous thermal insulation proposed under Option 3 would provide improved long-term operational energy performance and would ensure the suitability of the site for residential use.
181. The GLA does not currently provide Whole-Life-Cycle Carbon benchmarks specific to co-living spaces and as such the scheme has been assessed in relation to the requirements for *residential developments* which constitutes the most similar profile.
182. The application proposal: 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 A-C (excluding B6 - B7) whole life-cycle emissions would meet the GLA standard.
183. Carbon reduction measures incorporated to reduce the amount of embodied carbon resulting from the proposed scheme include the retention of the existing structure up to the sixth floor which significantly minimises the need for additional materials and construction processes, and an emphasis on the reuse and enhancement of existing/demolished material to incorporate circularity and therefore reduce carbon demand. Additionally, accommodation will be comprised of shower en-suites to enable the incorporation of prefabricated bathroom pods. Whilst wastewater-heat recovery (WWHR) has been considered, constraints related to the irregular stacking of bathrooms and inconsistent riser access and ceiling voids limit its overall feasibility.
184. The table below shows whole life-cycle carbon emissions per square meter in relation to the GLA benchmarks (embodied carbon without carbonisation applied) at planning application stage:

Scope	Proposed Development	Benchmark	GLA Benchmark
RICS components	KgCO2/m2	KgCO2/m2	
A1-A5	690.5	< 850	GLA Benchmark

		< 500	GLA Aspirational
B-C (excluding B6 & B7)	359.9	< 350	GLA Benchmark
		< 300	GLA Aspirational
A-C (excluding B6 & B7)	1023.5	< 1200	GLA Benchmark
		< 800	GLA Aspirational
B6 + B7	712.103	N/A	N/A

185. These figures would result in overall whole life-cycle carbon emissions of 11,996,542 kg CO₂e being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for 4,922,059 kgCO₂e (41% of the building's whole life-cycle), and the embodied carbon emissions for 7,074,484 tCO₂e (58.9% of the building's whole life-cycle carbon). The embodied carbon from the substructure contributes 1% to the total embodied carbon and consists of enhancements to the existing foundations, while the superstructure accounts for 42.3% of the total. Building services would contribute to 28.3% of total embodied carbon emissions, whilst finishes, fittings, furnishings and equipment would contribute 24%.

186. It is noteworthy to highlight that the operational carbon figures provided are based on Building Regulations UK Part L (BRUKL) figures and therefore do not demonstrate compliance with the GLA guidance which requires figures to be provided based on TM54 modelling. Whilst the BRUKL figures provide estimates of both regulated and unregulated energy use, they are based on standardised profiles and usage patterns from the compliance methodology rather than the expected use of the actual building and do not include elements such as lifts, external lighting etc. However, the operational carbon figures provided are considered to be in line with those seen across other major refurbishment schemes of a similar profile. Nevertheless, updated figures based on TM54 modelling undertaken at the detailed design stage will be secured by condition to provide a more accurate outlook and to ensure accordance with GLA guidance.

187. A detailed whole life-cycle carbon assessment confirming improvements that can be achieved through the detailed design stage, in particular those that have been identified in the application documents, and a confirmation of the post-construction results are required by conditions.

Urban Greening

188. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening

as part of the design and site. An Urban Greening Factor of 0.4 is recommended for predominantly residential developments. Draft City Plan 2040 policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context.

189. The scheme seeks to maximise urban greening potential within the parameters of the development. The landscape proposals include diverse, low-level perennial planting interspersed across the scheme, an extensive green roof combined with the PV system, new tree planting, and climbing plants on suitable structures.
190. The scheme would achieve a UGF of 0.22 which does not meet the London Plan minimum requirement. Consideration is afforded to the existing hard standing and urban context of the site within which opportunities for extensive greening are limited by space and access constraints, and servicing and vehicle requirements.

Biodiversity Net Gain

191. As the existing site is a zero-baseline site (i.e. has no vegetative habitats over the minimum mappable unit), it is acknowledged that the 10% BNG requirement is not mandatory.
192. Nevertheless, the BNG Metric has been applied as a demonstration tool to calculate the biodiversity units generated by the proposed landscape and shows that the soft landscaping proposals on the site have the potential to generate a 0.11 unit gain in biodiversity gain.

Overheating

193. To address urban heat island risks, the proposed development includes an approach designed around passive measures and limiting internal heat gains to minimise the need for cooling. This includes the use of naturally ventilation in co-living spaces with dedicated MVHR units, in addition to having radiant panels that can provide cooling in the summer. Openable windows are provided to increase occupants' comfort within these spaces.

Flooding

194. The site is located within Flood Zone 1 - land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (< 0.1%). The following measures have been considered to reduce the food risk to the site:
- Non-return valves will be implemented on the final drainage run to the outfall connection to prevent a sewer surcharge from causing flooding.
 - Surface Water discharge rates will be improved from existing to reduce the volume of water entering the Thames Water sewage system.
 - Pumping of surface water to prevent backflow into the basement from the combined public sewer in the event of a surcharge. Subject to CCTV confirmation of levels.

195. A large portion of the roof would be provided as a green / blue roof, which would capture surface water at source and reduce the peak runoff from the development, rainwater harvesting is proposed for irrigation purposes. There is an attenuation tank within the existing basement reducing flow within the blue roof system that provides 23m³ and 7m³ of attenuation respectively.

Water stress

196. Efficient water consumption through the specification of efficient fittings, sanitaryware and appliances will be maximised to target a minimum 40% improvement against the BREEAM baseline performance. The drainage strategy includes the incorporation of a blue-green roof with permeable paving to allow for attenuation via a cascading system which will drain into the attenuation tank. The attenuation tank will be sat above the basement slab level and will store water temporarily before controlled discharge via a pump into the Thames Water Network along Bridgewater Street.

Conclusion on sustainability

197. 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. The Local Plan policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.
198. The proposed development would deliver a high quality, energy efficient development that is on track to achieve an “Excellent” BREEAM assessment rating, in overall compliance with London Plan policy SI 2, Local Plan policy CS15 and DM 15.5 as well as Draft City Plan 2040 policy DE1. The proposals initially cannot meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme due to the proposed connection to the local heat network, however, the demonstrated high energy efficiency and the anticipated decarbonisation of the heat network and increasing heat network efficiency would reduce the carbon emissions associated with energy use as heat networks develop to supply heat and coolth in the most efficient way...

199. The assessment of options, carried out in compliance with the Carbon Options Guidance 2023, confirmed that although the preferred proposal would result in the highest whole life-cycle carbon emissions out of the 2 options, none of the other options would be able to deliver the holistic sustainability benefits that would complement the re-development of the site into a scheme according with the residential context of the immediate surrounding area. Opportunities to minimise the demolition of the existing building and maximise the reuse of deconstruction materials from the site have been identified to mitigate impacts of redevelopment. These include the retention of 90% of the substructure and 66 % of the superstructure, in addition to the re-use of re-purposed stone from the cladding of the existing building to create planters and seating. The proposal therefore would satisfy the GLA's circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and Draft City Plan 2040 policy CE1. The building design responds well to climate change resilience by implementing natural ventilation to respond to overheating risks, saving water resources and various opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Page 97 Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and Draft City Plan 2040 policies S14, OS1, OS2, OS3, S15, CR1, CR3.

Architecture, Urban Design and Public Realm

Policy Context

200. The relevant local policies for consideration are CS10, DM10.1, DM, DM10.3, DM10.4, DM10.5, DM10.6, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the Local Plan policies and HL1, S8, DE2, DE3, DE5, DE8, S10, AT1, S12 of the emerging City Plan, and London Plan policies D3, D4, D5, D8.

The Existing Site and Surrounding Townscape Context

201. 45 Beech Street is a commercial building, on the northern side of Beech Street accessed from the Beech Street tunnel. While not located within a Conservation Area, the site is located on the northern boundary of the Barbican Estate which is a designated Conservation Area, Listed Building and Registered Park and Garden. The existing building is L-shape in plan with a bird-mouth corner to the southeastern corner and is set over eight stories plus plant reaching +46.6m AOD. The body of the building formed of six storeys

(+36.6m AOD) with addition of two storeys (+42.4mAOD) to the south and one storey (+39.7mAOD) to the north set back from primary building line.

202. The building was constructed in 1956, formally known as Murray House, by Frank Scarlett, prior to the construction of the Barbican Estate which now surrounds it to the east, south and west. To the south the building relates both to the vehicular tunnel along Beech Street, and above to the Barbican Podium gardens. The lower level is particularly hostile, with the building entrance being located within the tunnel. There is a lightwell between the southern elevation and the Barbican Podium which enables daylight to reach the building entrance, creating a brief moment of relief within Beech Street tunnel. The ground floor condition is nevertheless highly compromised by the construction of the tunnel which has created a poor pedestrian environment. The dimensions of this lightwell and the alignment with the podium are also not completely parallel, which means that the southern elevation of the building does not align seamlessly with the podium or the two Barbican blocks which flank it to the east and west, Ben Johnson House, and Bryer Court, respectively. Resulting in the blank southwestern side elevation of the building being visible in views from the Barbican podium. When experienced at the higher Barbican podium level, 45 Beech Street is noticeably distinct from its context of the Barbican Estate due to its smaller scale, contrasting materiality (Portland stone), architectural aesthetic, albeit designed in a modernist architectural style and orientation.
203. The primary frontages of 45 Beech Street are to the South and East, at ground floor these are formed of large, glazed openings with Portland Stone columns and a dark stone base, the primary entrance is located in the middle of the southern façade, which is accessed via a number of steps. Step free access is provided via a ramp and entirely separate entrance door to the West. Neither the southern or eastern ground floor bays offer active engagement and visual interaction with the streets they address.
204. The body of the building addresses the Barbican Podium and the wider Barbican Estate. The façade to the South is characterised by a vertically orientated arrangement of square windows with rendered concrete spandrel panels beneath and concrete fins, set within a Portland Stone boarder, an architectural language which is continued along the southern façade of two storey setback floors, creating a sense of solidity and strength. The architectural treatment of the west end of the southern façade is articulated by rectangular windows set within Portland Stone. An architectural language which is also utilised on the return of the birds-mouth corner. The opposing corner of the birds-mouth is formed of Portland Stone and a decorative concrete mural at first floor. The eastern elevation is a simplified version of the southern elevation however with a stronger horizontal composition. The

setback floors of the eastern elevation are of poor quality and do not relate to the architectural language of the floors below. The existing roofscape is of poor quality and is cluttered by telecoms infrastructure.

205. Interior elevations, to the north and west, face onto an internal courtyard which is only visible from the public realm in fleeting views from the Barbican Podium under Bryer Court. The rear elevations are formed of white framed windows with a strong horizontal arrangement set within a rendered façade to the north and a red brick façade to the south. The internal courtyard is experienced as a harsh grey landscape, solely used for servicing, enabling access to the buildings lower-ground/basement of the building and a UKPN substation. The ground floors fronting onto the ramp are in poor condition and at present, the courtyard offers no amenity to office occupants.
206. To the north of the site is the narrow plot of Bridgewater House which forms the northern edge of the city block. Bridgewater House is formed of 7 storeys above ground and completes the eastern elevation of Bridgewater Street. The architectural language of Bridgewater House sits in contrast with the 45 Beech Street, with the body of the building formed of yellow brick with red brick detailing and brown framed windows to the primary frontages to the east and north. The northern façade fronts onto to the internal courtyard and is rendered white.

Proposal

207. The proposal is to extend and re clad the existing building and change its use from office to communal living with a public café on the ground floor.

Architecture and Urban Design

Bulk, Height and Massing:

208. The height, massing, and overall expression of the development has been carefully considered in relation to key townscape views, with particular attention to views experienced from within the Barbican Estate at Podium Level. These are discussed in the following section of this report.
209. The proposal would retain a significant proportion of the existing structure, and as such the building's plan form would predominantly follow the existing building lines. The greatest alterations to bulk and massing come from the upward extension at level 06 increasing the height of the building to +50.0m AOD. Where the existing terrace at level 06 on the south would be filled in, and the building shoulder height pulled up by two storeys reaching +44.0m

AOD, it would strike a comparative alignment with the two Barbican Blocks which flank the site on both sides. The top of the building is expressed by a series of arched roofs, which on the south are set back from the body of the building creating private terraces.

210. The total increase in the bulk and scale of the building would therefore be moderate and maintain its commensurate scale with the neighbouring Barbican blocks and Bridgewater House to the North.

Expression and Materiality:

211. Owing to the building's location between the Listed buildings, and Conservation area, the character and expression of the building has been designed to respond to the modernist aesthetic of the Barbican but be legibly different through its bay detailing and the overall pattern of fenestration and materiality. The building has been given a clear base, middle and top, elaborated upon below.

The Base

212. As stated previously, the base of the building is experienced from within the dark and hostile tunnel along Beech Street, and the narrow Bridgewater Street, the western elevation of which is dominated by the solid and inactive blue metal cladding of the back of the Barbican Exhibition Hall. The architecture of the base of the proposed building provides a unique opportunity to add visual interest and vibrancy to these underperforming areas of public realm and ensure the base of the building is legible and prominent on approach. The base would be expressed as a double order to the south to signify the primary entrance and a single storey to the east and are broken down into three bays to the south and four and half bays to the east, following the existing column rhythm. Colour, texture and depth would be used within these bays to create a more vibrant and dynamic ground floor below the Barbican Podium. The use of vibrant orange aluminium portal frame with orange glazed ceramic tiles all set within a highly aggregated GRC Frame would enliven the base of the building while respecting the sensitive heritage environment above. The majority of the ground floor bays would be clear glazed, to ensure views into and out of the ground floors, again adding animation to the streets. Further design development will be secured via condition to ensure an integrated and high-quality finish is achieved, through the use of lighting, colour and texture.
213. The secondary entrance into the building would be via the entrance gate access from Bridgewater Street. The decorative metal gate would be used by

both vehicles and pedestrians and would be designed to be both inclusive and welcoming. Further details would be secured via condition.

214. This approach of injecting moments of playful vibrancy to the base of the building would continue around onto the interior elevations of the courtyard. Here, the base of the building would be repainted in an orange colour to help inject life and vibrancy to what is currently a hostile, dark and unwelcoming space, helping to transform its character and supports its use as a meaningful area of external amenity space for building residents. The existing openings at ground floor level would be reduced in height to create a long horizontal slot window, and at lower ground floor level the addition of five oval windows to provide more light into the interior spaces, and additional animation to the courtyard.
215. The main entrance, like the existing building, would be centred on the Beech Street elevation. The existing level change would be simplified by building up the internal levels to create one consistent internal floor level which would be navigated externally by either three steps or gentle slope located to the east of the main entrance, allowing level access through a single point of entry.
216. The proposed ground floor elevations would be transformed to be outward-facing and visually permeable, allowing passers-by to look into communal amenity spaces and proposed public café. The proposed addition of a café on the eastern corner would also increase animation and is a welcome addition to the proposal, details of which will be conditioned. Overall, officers consider that the proposal's adaptations to the ground floors would provide greater animation and enhance the quality of the surrounding streets and significantly improve the design quality of the base of the building. A condition will be applied to the application to ensure the glazing remains clear and transparent to enable views into the base of the building.

The Middle

217. The south and east elevations follow the same design principles as each other and are broken down into bays which continue the rhythm up from the base below. The bays would be framed by a panellised sandy coloured textured GRC with exposed fine aggregates as below. The repeating bays are formed of a horizontally arranged double window module, set within white tiles and divided down the centre by white tiled pier. The square window module would be formed of a vertically ribbed dark metal spandrel panel to the base of the window and an openable decorative panel to one third of the module. The window module has been designed to maximize the natural light, prevent overheating and provide natural ventilation. The windows have been set into the façade by 365mm providing increased depth to the façade

creating natural solar shading and creating a more dynamic façade treatment which varies when viewed from oblique angles.

218. The birds-mouth corner which connects the primary elevations, is a moment of calm relief and solidity, is formed of GRC panels which are punctured with oval windows to the east elevation, which take inspiration from the surrounding Barbican context, where similar oval proportions are found at the top of the Barbican Towers.
219. The internal elevations would be rationalised and a consistent language across both elevations would be introduced. The windows would be arranged in horizontal grouping made up of fixed and openable windows and bright coloured spandrel panels. The windows have been enlarged to maximise levels of natural light within the courtyard facing rooms, and openable panels have been included within every room to allow for natural ventilation. The openable elements would be mirrored on each floor creating variation as you move up the façade. Both internal facades would be rendered in a light colour, creating an air of lightness and neutral materiality to the façade composition, to match the rear façade of Bridgewater House.

The Top

220. The top of the building is expressed through a series of repeating double height arched bays. The south elevation is formed of four equally bays while the east elevations are not equally spaced, with two wider bays to the south and two one-storey bays to the north sandwiching the five equal bays. The arches along the southern elevations have deep reveals, clad in zinc, which create natural subdivision of the balconies associated with those rooms, as well as providing natural solar shading and the concealed integration of downpipes. Each arch would be subdivided by asymmetrical rectangular white porcelain tiled panels and glazed opening, divided by projecting aluminium frames finished to a 'Architectural Bronze' colour. The soffit of the arch would be decorated with white metal batons to inflect additional visual interest. The variations in the materiality would add texture and complexity to the roofscape creating a positive sense of differentiation between 45 Beech Street and the surrounding Barbican Blocks, which are cast in white painted concrete.
221. Along Bridgewater Street the architectural treatment of the arches would follow the same design principles as those on the south, however, the reveals would be reduced, and no balconies would be provided on the eastern elevation. The single-storey arches to the north end of the elevation would form the balustrading to the communal amenity behind and have a different

architectural language incorporating back painted glazing with vertical metal detailing.

222. Finally, the top floor has been designed to incorporate biodiverse green roofs, PV panels, plant equipment, all of which would be set back significantly from the south and east elevations ensuring it would have no visual impact from the Barbican Podium. A 1.1m high lightweight maintenance railing would run around the western edge of the roof and would not be visible from the public realm. As the roofscape would be visible from surrounding high-level windows, further details are required to ensure the building's roofscape is of high quality.

223. A number of objections have been raised on the design of the proposed roofscape and its apparent similarity to the Barbican blocks adjacent. Discussions on the comparative similarity and difference, and the implications of these are discussed within the assessment of indirect heritage impacts below.

Outdoor Amenity and Landscape Design

224. Three different outdoor amenity spaces are proposed at 45 Beech Street, with the primary communal amenity space located at roof level 09, the secondary amenity space located within the internal courtyard and private balconies located at level 08 along the southern elevation.

225. The level 09 terrace would be located at the end of communal corridor to the northern end of the building and would provide an intimate elevated terrace for the use of the co-living tenants. The space would incorporate planters, fixed and unfixed furniture to create a flexible space while ensuring inclusivity and safety. Planters would run around the edge of the level 09 terrace behind the balustrading creating a planted edge to the terrace providing an integrated buffer to the building edge, creating a natural deterrent. The terrace layout and balustrading would be designed in line with the City of London Corporation Preventing Suicides in High Rise Buildings and Structures planning advice note. Further detail regarding suicide prevention, inclusivity and landscaping would be secured via condition.

226. The internal courtyard is currently dominated by the existing vehicular ramp, a substation and black metal infrastructure which provide means of escape from surrounding buildings. The proposals aim to work with this constrained environment to provide a unique amenity space for the building occupiers. Alongside the architectural interventions mentioned previously the proposal would introduce natural materials, such as clay bricks for paving, planters, terracing and seating, shade tolerant planting, mirrored screening, and bright

coloured paint to the existing metal infrastructure. Creating an informal amenity space within this currently underutilised space which would have level access from the laundry room and cycle store. Making the internal courtyard a good location for the building occupants to sit and relax as well as dry laundry and fix their bikes.

227. At level 08 the massing is set back from the building edge creating five balconies along the south elevation. These would form private amenities for five of the South facing rooms on level 08. The planters would be arranged on the outside edge of the metal balustrading creating a soft green planted edge.

228. Notwithstanding the approved drawings, the final details of the landscaping including full planting specification, hard and soft materials, furniture, maintenance regime, and irrigation, in accordance with the City of London Technical Toolkit, will be conditioned to ensure the design and materials are of high quality, so the landscape thrives and is of acceptable design quality, and is fully inclusive.

229. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and coordinated 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 form, 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.

Conclusion on Architecture and Public Realm Design

230. Officers consider that the architectural design of the building would be compatible with the existing context in terms of scale and massing and be read as a well-layered piece of design, which would improve the building's contribution to the local townscape. The ground floors would also be transformed to be outward-facing and visually permeable, encouraging a positive interaction with surrounding streets. Similarly, the proposals would enhance the landscaping within the site, providing richer planting and greater opportunities for sitting and external amenities. The proposals would particularly enhance the overall quality and character of the internal courtyard

and public realm along Beech Street, which is currently hostile and underutilised.

231. The proposals would comply with Local Plan Policies CS10 and DM10.1, Draft City Plan Policy S8, DE2, HL1, and London Plan Policy D3, and paragraphs 135 and 137 of the NPPF.
232. Irrespective of the approved drawings, full details of the ground floor frontages, typical bays, and way-finding strategy are reserved for condition to ensure these are well-detailed and are useable. The development has had regard for Local Plan Policy DM 3.2 and the Mayors Public London Charter promoting a safe, inclusive and welcoming environment.

Heritage and Strategic Views

London View Management Framework (LVMF) and City of London Strategic views

233. For completeness, the proposal has been considered in relation to the LVMF and other Strategic Views (including the World Heritage Site). The proposal's small scale, dense urban location and distance from the WHS means that it would not appear in any of these views and therefore the relevant policies in the London and Local Plans would not be triggered.
234. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents.

Designated Heritage Assets - Direct Impact

235. The building is not listed or located within a Conservation Area. An assessment as to whether it is considered a non-designated heritage asset is set out below.

Non-designated heritage assets

236. Non-designated heritage assets (NDHAs) are defined in National Planning Policy Guidance (NPPG, para 039) as 'buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets'. Criteria for identification of sites as NDHAs are suggested in Historic England's Advice Note 7 (Local Heritage Listing). The criteria comprise: assets type; age; rarity; architectural and artistic interest; group value; archaeological interest; historic

interest; and landmark status. An assessment of the existing building against these criteria is made below.

237. In terms of asset type, age, rarity, as a purpose-built commercial building of the late 1950s, 45 Beech Street is an example of a mid-20th century (post-war WWII) commercial development in a vaguely modernist idiom. Such buildings are now comparatively rare in the City, though not nationally, so the building is considered to possess a degree of rarity at a local level.
238. Furthermore, the building's curious spatial relationship with the surrounding Barbican Estate is considered to hold a minor degree of historic interest by illustrating how the Estate's bold architectural ambition broke absolutely with the remnants of the existing historic street pattern and few preceding standing buildings, of which the application site was one.
239. However, the existing building is, through its modest scale and architectural anonymity, not considered to possess any group value with the buildings of the Estate; the building is not considered to hold any architectural qualities of note, being a simple exercise in masonry-faced, rectilinear elevations between unprepossessing base and roof treatments. As such, the building is not considered to possess architectural or artistic interest. The building is not considered to hold any archaeological interest of past human activity.
240. Finally, as a result of its encasement by the Barbican blocks, and the challenging relationship to Beech Street which makes the approach to the building underwhelming and difficult, officers conclude that the building cannot lay claim to any form of landmark status.
241. In conclusion, the building meets, to a very limited extent, two of the seven criteria suggested by Historic England for identifying non-designated heritage assets. On balance it is considered that the building does not possess enough heritage significance to warrant this status, and therefore its extensive refurbishment is not objectionable from a heritage perspective.

Designated Heritage Assets - Indirect Impact

Registered Historic Park and Gardens:

Barbican Estate Registered Historic Park and Garden (RPG) (Grade II)*

Significance:

242. The landscape of the Barbican Estate was conceived and designed as an integral part of the architectural design by Chamberlain, Powell and Bonn with the architects recognising that the spaces between the buildings were of equal importance to the structures themselves. The landscape is now designated as a grade II* Registered Historic Park and Garden (2003) and is one of only two post-war landscapes designated above Grade II within Greater London. Its heritage significance is derived from the following values:

- The creation of the Barbican as a vehicle-free environment through the raising of the precinct above ground level on the podium, creating vehicle-free space the quality and quantity of which is unparalleled in London.
- The raised ground of the podium and the highwalks as an intrinsic and distinctive feature of the estate. The raised ground provides viewpoints from which to survey the surrounding city below, and, together with the limited entrances to the complex at ground level, contributes to the conception of the Barbican as fortified structure from the surrounding streets.
- The volume of space created by the concentration of built development in dense 'off-the ground' structures. These spatial reservoirs are recognised to be as significant as the buildings themselves.
- The contrast of the planning of the Barbican with the grain and plan of the surrounding townscape, and the creation of characteristically unique dramatic vistas across the estate and into the surrounding townscape.
- The richness and variety of types of external space across the estate delivered within a consistent design idiom, the scale of which is unique.
- The successful designed relationships with 'found' historic elements including the Roman and Medieval wall, and the Church of St Giles Cripplegate and associated gravestones.
- The urban character of the Barbican, and its conception and realisation as a new piece of urban fabric designed and delivered in its entirety by a single client and architect.
- The consistent use of a small number of materials and detailing across the estate, delivering a powerful sense of visual continuity and consistency to the estate.
- The impact of soft landscaping and the value of experiencing the architecture of the Barbican in the context of trees, foliage, and greenery. Originally this appears to have been intended to result from use of a restricted palette of planting in raised blocks of greenery or planter boxes which assumed an architectural significance in relation to the buildings. The layout established by Janet Jack across the upper podium employs a freer geometry and more varied planting palette.

Setting:

243. Due to the contained and raised nature of the Registered Historic Park and Garden, the primary setting of the landscaped gardens are the Estate buildings and historic elements within it. The enclosed nature and raised level separate the wider townscape adjacent to the Barbican, aside from glimpsed views between buildings from surrounding streets.
244. The setting of the northern boundary, relevant to this application, is highly enclosed, with 45 Beech street forming a prominent backdrop to the northern edge of the central avenue known as Beech Gardens, sitting as it does in between Barbican blocks, where both its primary southern, and secondary eastern facades are experienced and enclose the edges of the gardens. The scale and location of 45 Beech Street means that it is highly visible, and of a height that contributes to the sense of enclosure and isolation which is characteristic of the Gardens. This northern edge is considered to make a neutral contribution to the setting of the Gardens because, while offering enclosure and being a well-established calm backdrop, 45 Beech Street is experienced as a disassociated built form - owing to its physical separation from the Podium - and contrasting appearance.

Impact

245. The proposals would have intervisibility with the landscape of the Barbican Podium from views within the Estate. The additional height and expression of the proposed development would result in a slight change to the setting. Comments have been received from The Gardens Trust contending that the proposals would be harmful to the heritage asset, however officers consider that the change to setting would not be counter to the prevailing characteristics of the northerly setting of the RPG, and would not detract from the qualities that underpin the significance of the Registered Historic Park and Garden. The proposal would preserve the setting and significance of this designated heritage asset.

Listed Buildings:

Barbican Estate (Grade II)

Significance:

246. The Barbican Estate, designed by Chamberlain, Powell and Bon, is a leading example of a modernist project in the high Brutalist style, and is perhaps the seminal example nationally of a comprehensively planned, post-war, mixed-use scheme. The Estate is a composition of towers and long slab blocks at raised podium level, separating pedestrians from vehicular traffic, which

enclose private and public landscaped open spaces centred on a canal in a Le Corbusian manner. It is of architectural interest for its compelling architectural narrative, which encapsulates the macro and micro design intent of the architects in a dramatic arrangement of buildings and spaces which are tied together by a consistent and well-detailed bush and pick-hammered finish. It is of historic interest as a modern exemplar of comprehensively planned high-density urban living during the postwar period delivering essential housing for the City of London, and for the associations with the architects.

Setting:

247. Overall, the Barbican Estate is appreciated as a standalone set-piece of architectural design and this is supported by the Listed Building Management Guidelines Volume II. There is little reliance on the wider surroundings to aid appreciation or an understanding of the Barbican's historic, architectural and artistic values. Exceptions to this are the Golden Lane Estate to the north and listed buildings to the south including St Giles Cripplegate and Ironmongers Livery Hall.
248. The Estate's setting varies greatly around its perimeter, where a varying range of mostly modern, large, and predominantly commercial buildings of differing materiality and composition, form a well-established neutral contribution to the Estate's setting and significance. Their scale and proximity reinforce the enclosure and segregation characteristic of the Barbican Estate, albeit in a neutral way unrelated to heritage significance. 45 Beech Street is one such building, however, due to its scale and embedded location amongst the Barbican, it has a more visibly acute and unique relationship with the Estate, since it forms part of its primary, inward-looking frontage. Despite this proximate physical relationship, and its solid modernist architectural expression, 45 Beech is not experienced and appreciated as a Barbican building. This is due to its smaller scale and slightly skewed alignment, which makes it subservient to the Barbican; its commercial use; and contrasting architectural expression and materiality.
249. As set out in the NDHA assessment above, there is a minor degree of interest in the relationship between 45 Beech Street and the Barbican, as a vestige of earlier, fledgling post-war commercial development ruthlessly encased by the groundbreaking Estate – elucidating the assertive modernist vision of the Barbican. However, notwithstanding this, it is considered that the architectural anonymity and small scale of the existing building means that, overall, its contribution to the setting of the listed building is neutral.

Impact:

250. The proposals would have a high degree of intervisibility with the Barbican Estate both from within its setting and from views within the Estate. As discussed above, the existing 45 Beech Street building forms a neutral part of the northern boundary to the Estate.
251. The proposals would result in a change to the setting of the Barbican in two ways. First, by virtue of the increased scale, which would rise to a similar height as the Barbican slab blocks, and second, because of the change in architectural expression which would, in places, reference some of the language of the Barbican – via material choice and some architectural devices. The proposed architectural language and expression of the development has been designed to sensitively respond to the Barbican Estate buildings, balancing the need to respond to the character and appearance of the buildings which form its immediate context, while also remaining distinct from them.
252. A key point of contention raised by objectors has been the application of barrel-vaulted roofs, which they consider to be an “inappropriate pastiche of the original Barbican estate”. Officers come to a different view, considering that the design of the arched roofs – which have a noticeably different rhythm, scale, materiality, radius, depth and internal subdivision – would establish a positive sense of differentiation, adding interest to the roofline of the block, hierarchy to the building, and its overall quality. While officers recognise the importance of the Barbican’s vaulted roofs to the architectural significance of the estate – of which it is one of a number of architectural signatures - officers do not consider that the proposals threaten or undermine the integrity of the Barbican blocks, the gravitas and interest of which could/would still be fully experienced and appreciated even in those instances where the two roof forms are seen alongside each other. Furthermore, at no point would the proposed roofs change the way the Barbican roofs are experienced as part of the whole Estate. Officers draw the same conclusion with respect to the design of the rest of the building, noting that while some of the architectural language is shared – namely though the strength of the concrete horizontal banding, and use of white tiled inset panels – there would still be palpable difference within the elevations and the application of materials and forms to ensure the 45 Beech street is not read and identified as a Barbican block, and instead as a modern addition to the townscape. Equally, the solidity which remains within the façade, and the overall balance of solid to void, ensures that the development would sit comfortably within the setting of the Barbican, and not be experienced as a starkly different or distracting presence.
253. Officers further consider that many of the defining features and design parameters which signify the historic relationship, such as the depth of the

set back and quirk of the skewed relationship to the podium, and the way that 45 Beech Street would still be seen and experienced coming to ground below the podium, would remain interpretable.

254. Overall, the development would not challenge or detract from the pioneering mid-20th century masterplan, architectural language or qualities which underpin the significance of the Barbican Estate and its existence as a distinct entity would remain appreciable. It is therefore considered that the proposals would preserve the setting and significance of the listed building.

Conservation Areas:

Barbican and Golden Lane Estates Conservation Area:

Significance:

255. The Barbican and Golden Lane Conservation Area Character Summary and Management Strategy SPD (2022) articulates the character, appearance and significance of the Conservation Area set out within six attributes identified within Section 1 ('Summary of Character, Appearance and Significance', pp.4), as follows:

- Two estates which, together, provide a unique insight in the creative processes of a seminal English architectural practice, Chamberlin, Powell and Bon.
- Integration of the ancient remains of the Roman and Medieval City wall, including Bastions 12, 13 and 14 and the medieval church of St Giles Cripplegate in a strikingly modern context.
- In scope and extent, the estates are important visual evidence of the scale of devastation wrought by the World War 2 'Blitz' bombing campaign of 1940 –1941.
- Seminal examples of ambitious post-war housing schemes incorporating radical, modern ideas of architecture and spatial planning reflecting the development of both Modernism and Brutalism.
- Unprecedented and ingenious provision of open space and gardens within central London, which continue to be a defining characteristic of the estates today.
- New and striking architectural idioms, particularly at the Barbican, applied on a significant scale; a new architectural language deliberately modern and forward looking; a way of planning and arranging buildings and spaces which was unprecedented in Britain and reflected evolving ideas of the modern city.
- Overarchingly, the character, appearance and heritage significance of the conservation area can be summarised as the striking juxtaposition

between two seminal post-war housing Estates which illustrate evolving trends in architecture, spatial and urban planning and Modernism in general.

256. To summarise, the conservation area is defined by its pervasive modernity, by the consistency of modern forms, spaces and finishes throughout, all executed to a very high standard of quality and representing an immersive experience strikingly at odds with the more traditional townscapes and buildings outside the boundary.

Setting:

257. The wider setting of this large Conservation Area is informed by dense urban development, of a largely post-war, post-modernist and modern architectural character. The northern boundary abuts the London Borough of Islington, and this setting is typically lower rise with a mixture of modern and historic built fabric set out on a historic streetscape. Just outside of the Conservation Area boundary, 45 Beech street informs a small portion of the northern boundary in-between the Barbican and Golden Lane estates. To the east, there is again a mixed townscape around Moorgate, although largely comprised of large scale modern commercial buildings in the immediate vicinity of the Conservation Area – namely the redeveloped series of office blocks that were built along the road London Wall in the 1970s. To the south, the setting is principally formed by the main route of London Wall, former Museum and Ironmongers, and further large-scale modern commercial buildings. To the west, late 20th century, mid-rise commercial buildings line Aldersgate Street, largely obscuring the more historic areas of Smithfield Market and Charterhouse Square which are adjacent these have a neutral presence.

258. 45 Beech Street, located within the folds of the Conservation Areas' boundary, towards its geographic centre, is one of a number of large commercial buildings which form part of the established characteristics of the townscape surrounding the Conservation Area. On balance, the existing building is considered to make a neutral contribution to the setting of the Conservation area, since it gives definition to the boundary adding to the sense of isolation and singularity of the Barbican estate; it reinforces the striking juxtaposition of townscape character to its surroundings through the Barbicans grander scale and more assertive architectural style; but is not of appreciably high architectural quality.

259. As set out in the NDHA assessment above, there is a minor degree of interest in the relationship between 45 Beech Street and the Barbican, as a vestige of earlier, fledgling post-war commercial development ruthlessly encased by the groundbreaking Estate – elucidating the assertive modernist vision of the

Barbican. However, notwithstanding this, it is considered that the architectural anonymity and small scale of the existing building means that, overall, its contribution to the setting of the Conservation Area as a whole is neutral.

Impact:

260. The impact of the proposed development would be limited to experiences within and across the north/central boundary of the Conservation Area, particularly on the Barbican Podium with views looking north out of the Conservation Area, and east and west along the podiums Beech Gardens. The SPD notes that views out of the two estates, with glimpses of the surrounding City, are likely to change because the Conservation Area sits within the dynamic context of a densely developed urban centre. Furthermore, larger modern buildings are an established characteristic of the townscape surrounding the Conservation Area. In a similar vein to the conclusion on impact drawn for the Barbican as a listed building, officers consider that the proposals would have a neutral impact on the significance of the Conservation Area, since it marks only a small portion of the extensive and dynamic Conservation Area setting. The proposals would also continue to preserve the boundary and edge relationship to the Barbican, but slightly change the juxtaposition in architectural aesthetic. However, officers consider that despite this change, the significant qualities of the Conservation Area as set out above would remain appreciable.

261. Overall, the proposal would preserve the setting, significance, character and appearance of the conservation area.

262. There have been no objections from the LB Islington.

Other Designated Heritage Assets

263. In accordance with paragraph 200 of the NPPF, the assessment of heritage impact has been extensively scoped, using digital modelling software to identify heritage receptors through a zone of theoretical visibility. The impact on these receptors was then checked in a 3D model as part of a desk-based assessment and accurately detailed with verified photography and site visits to illustrate the extent of visual influence (field evaluation).

264. As a result of this methodology, potential impacts of the proposal on the settings of the above heritage assets have been identified and assessed.

265. In respect of other heritage assets, officers have scoped an extensive number. 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 number of heritage assets, and it would be disproportionate to assess them all.

266. In particular, it is considered that the following were found to have no visual relationship with the proposal and therefore were scoped out of the assessment:

- Golden Lane Estate Registered Historic Park and Garden (Grade II*)
- Crescent House (Grade II*)
- Cullum Welch House (Grade II)
- Cuthbert Harrowing House (Grade II)
- Bowater House (Grade II)
- Great Arthur House (Grade II)
- Golden Lane Community Centre (Grade II)
- Bayer House (Grade II)
- Stanley Cohen House (Grade II)
- Golden Lane Estate Leisure Centre (Grade II)
- Basterfield House (Grade II)
- Hatfield House (Grade II)
- Cripplegate Institute (Grade II)
- The Jugged Hare Public House (Grade II)
- Jewin Chapel – non designated heritage asset
- Brewery Conservation Area
- Smithfield Conservation Area
- Chiswell Street Conservation Area

Impact on nearby Non-Designated Heritage Assets

267. An objection response has been received contending that Bridgewater House, adjoining 45 Beech Street to the north, should be considered a non-designated heritage asset and the impacts of the development be assessed as such.

268. While noting Bridgewater House's historic relationship with the development of Bridgewater Square C. 1920, officers disagree that the building is of sufficient architectural or artistic quality, rarity, age, historic or archaeological interest, landmark status or group value (as identified within the HE guidelines) to be considered a non-designated heritage asset. Furthermore, officers conclude that in urban design terms, the proposal would be a positive addition, and improvement upon the contribution of the existing building to the local townscape, by virtue of its enhanced ground floors, and well-articulated roofline, as well as being of a compatible height and scale, and as

such in the case of Bridgewater House, would contribute positively to its composition as part of the established urban block.

Conclusion on Heritage

269. The proposal would preserve the settings and significance of all relevant designated or non-designated heritage assets and would accord with policies CS12 (1) and DM12.1 (1) of the Local Plan 2015 and S11 (2) and HE1 of the emerging City Plan 2040.

Access and Inclusivity

Policy Context

270. The relevant local policies for consideration are CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the emerging City Plan 2040 and policy D5 and D7 of the London Plan. In particular, policy DM10.8 requires to achieve an environment that meets the highest standards of accessibility and inclusive design in all development (both new and refurbished), open spaces and streets.
271. Local Plan policy DM 10.8 requires “to achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished)”. A service provider also has an anticipatory duty under the Act.
272. The proposed development has been carefully designed within the constraints of the existing buildings to ensure that the access needs of all users have been considered.

Arrival at the Site

273. The site is well-served by public transport, including London underground from Barbican and Moorgate, national rail from Farringdon and Moorgate and Buses from Beech Street and Aldersgate Street, noting that public transport is not accessible to all people. The walking distances from key public transport nodes exceed the recommended 50m without a rest. It is therefore recommended that resting points with accessible seating are proposed wherever possible at maximum intervals of 50m along the approaches to the building from key points of arrivals. A travel plan would be secured via a Section 106 agreement to detail how disabled visitors could request support

to get to/from this site if required. The applicant would also be obligated under the travel plan to report on issues relating to access to the site by visitors or tenants. Further details of the travel plan are set in the Transport and Highways section of this report.

274. Consideration has been given to the points of arrival at the site including the primary entrance which has been altered as part of the proposal to provide step free access alongside removing the level change internally. The new ramp would be of a 1:20 gradient providing would be bounded by the building and a planter which would create a minimum upstand of 150 mm in height, which would act as a tapping rail for long cane users as well as a safeguard for wheelchair users. There should also be no projections or overhangs that could pose a hazard (BS 8300 1: 8.1). An Access Management Plan (AMP) for visitors and building users on points of arrival and entrances would be required and would be secured by condition.
275. It is also welcome that a new accessible parking space is proposed on site at the top of the internal courtyard ramp adjacent to the rear exit of the shared kitchen space. Users of the bay would be able to access to the building via the adjacent door through the shared kitchen. Further details of management and design of this entry point and Electric Vehicle Charging (EVCP) would be included within an AMP and secured via condition.
276. Continuing provision of the existing Blue Badge space in the area during construction is important provided it is safe for use and it is recommended that details are reserved of how this continuous provision will be secured through the Deconstruction and Construction Logistic Plan.

Cycle Provision

277. The long stay cycle parking would be accommodated within the basement and would have two means of access either via the internal courtyard at the bottom of the internal ramp which is accessed via the gate located to the northern end of Bridgewater Street or via internal cycle lifts which would be access via the primary entrance of Beech Street. The courtyard ramp is to be retained and regraded however it would be 1:4 gradient in some locations which would not be accessible to number of users, and it would be deemed the secondary means of access to the cycle store, with the majority of users using the cycle lifts. All gates and doors along the route would be automated sized in accordance with Approved Document M. The Access Advisor has advised that controls should meet best practice guidance as set out in BS 8300 (2) 8.2.3 to be accessible to a range of users.

278. The short stay cycle parking spaces would be provided within the public realm along Beech Street located adjacent to the primary entrance.
279. It is noted that 5% of long stay 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. Irrespective of the approved drawings, full details of the cycle stand types and the setting out of the bike store, including swept paths, and end of trip facilities are reserved for condition to ensure these are well-detailed and are useable promoting a safe, inclusive and welcoming environment.

Entrance

280. All entrances to the development would all be step free, automated and with a minimum clear opening width of at least 1000mm. However, it is noted that the ramp located in the internal courtyard is not accessible and only the top and bottom of the internal courtyard provide inclusive level access. The primary residential entrance along Beech Street would be an automated double leaf sliding door type. Further detail will be secured via condition to ensure the design of the manifestation, thresholds, mat wells and floor finishes, and door furniture are designed to be inclusive-design best practice guidance.
281. Reception facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2 Routes from the entrance/lobbies should be logical, clearly defined and unobstructed, with adequate and sufficient circulation space. Reception area desks should be positioned away from the entrance to minimise noise, with lowered counter sections, appropriate hearing enhancement systems and the surface of the reception area should be slip resistant. Details would be provided through condition.

Vertical Movement

282. London Plan D5, (B)5 states 'in all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'. 6.2.1 further states that there should be an evacuation lift in addition to fire-fighting lifts. All lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure.
283. The proposed pair of lifts located within the reception lobby would be sized appropriately to provide access to the bike store in the basement. The detail

design would be secured via condition to ensure the lift is designed to accommodate all bike types, in line with London Cycle Design Standards, including larger recumbent bikes as well as being welcoming and inclusive.

Horizontal Movement

284. Corridor widths and door openings are confirmed as consistent with AD M(2), including sufficient door widths and passing places for wheelchairs and will be subject to detailed design development.

Communal Facilities

285. The proposal includes a number of internal communal spaces and the public café all of which should be designed to meet the highest standards of access and inclusion, creating buildings which meet the needs of the existing and future population in line with London Plan D5 3.5.9.
286. BS8300 2: 20.8.4 says that 'Disabled people should have the same access to all fitness and exercise areas, and types of equipment, as non-disabled people' and this should inform the provision of gym equipment/facilities. The gym facilities should be designed in line with best practice guidance produced by Sport England and further details will be secured via the AMP and through recommended condition.

Residential Rooms

287. All rooms would be accessible via step-free routes and 10% of all rooms would be accessible consistent with London Plan Policy E10H. All accessible rooms would be designed in line with AD M4(3) and would have an entrance door with a minimum clear opening of 850mm with minimum of a 300mm leading edge to the door, a 1100x1700mm wheelchair storage and transfer zone, a minimum of 1500mm in front of the kitchenette and ensuite sanitary facilities in line with AD M4(3). Details to be provided in the AMP through recommended condition.
288. All rooms would have a 750mm movement route from the point of entry to the openable window, which is acceptable.
289. The accessible rooms would be prioritised for disabled residents, and there must not be a premium rental cost for these units to disabled residents. Allocation and management of the accessible units is to be secured in the Operational Management Plan as part of the Section 106 agreement.

Terraces and Garden Space

290. The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind.
291. The landscape layout will be conditioned to ensure that it is welcoming and inclusive for a wide range of users and provides a variety of seating options for a range of people including handrails, backrests, and sufficient contrasts. Where bleacher-style seating is proposed it should allow for a wheelchair user to be able to sit alongside another wheelchair user, or seated companion and not project into the access route in front. See BS8300-2:2018 Section 17 for details.
292. The detailed design for the communal amenity terraces and internal courtyard garden should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping will be secured by condition, and that details on how the planting specification would be inclusive is provided.

Sanitary Facilities

293. It is confirmed that an accessible toilet will be provided at ground floor in close proximity to the Café and communal kitchen.

Signage and Wayfinding

294. Signage and wayfinding will be important for navigating the site and should be designed with reference to guidance in PAS 6463: Design for the Mind and following the principle of 'two senses'. Details of signage and wayfinding will be secured by condition.

Access and Inclusivity Conclusion

295. The proposal has been designed to ensure that the site meets the highest standard of inclusive design. In order for the proposed co-living use to fulfil its goal of being an inclusive and welcoming place to live, high accessibility standards and inclusive environments and practices are essential. Great consideration has been given as to how to get beyond the limitations posed by the existing building in order to secure the optimal solution for the greatest range of building users. Subject to further design details and an Access Management Plan, it is considered that the proposal accords with the access related policies outlined above.

296. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above.

Fire Safety

297. Policy D12 of the London Plan requires all development proposals to achieve the highest standards of fire safety.

298. The submission includes a fire statement (Artec Fire, Feb 2024) which sets out how fire safety has been designed into the proposal in consultation with the approving authority (Bureau Veritas Building Control) and sets out how the principles of BS 9991:2015, with reference to Approved Document B Volume 1 (2019, inc. 2020 and 2022 amendments) and BS 9999:2017, where applicable have been followed.

299. Due to the scale of the proposed development, and as it is for a form of housing, the proposal was referred to the Health and Safety Executive (HSE) as a statutory consultee. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified some matters as supplementary information, that the applicant should try to address, in advance of later regulatory stages, where the applicant will have to demonstrate compliance. In response the applicant has affirmed their commitment to this.

300. As the proposal is referable to HSE, the District Surveyor has not commented on the proposal.

301. Considering HSE are satisfied with the proposed fire strategy, subject to approval at later regulatory stages, the proposal is considered to be acceptable with regards to fire safety, in compliance with Policy D12 of the London Plan.

Transport and Highways

302. Policy DM16.1 of the Local Plan 2015 states that development proposals which are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation in particular addressing impacts on: road dangers; pedestrian environment and movement; cycling infrastructure provision; public transport; and the street network.

303. In line with policy DM16.1 the applicant has submitted a Transport Assessment which covers the above matters. An assessment of the key transportation aspects of the scheme are set out in the following section of this report.

Public Transport

304. The site has a PTAL of 6b and is highly accessible by public transport. Barbican Underground Station is located approximately 150m from the site, taking less than 3-minutes on foot. Barbican is situated on the Circle, Hammersmith and City and Metropolitan lines. These lines offer connections with Hammersmith, Barking, Aldgate, Amersham, Chesham, Uxbridge and Watford.

305. The station benefits from frequent services in both an eastbound and westbound direction, with trains running every 2-4 minutes. The site is near equidistant between Farringdon and Moorgate Railway Stations, taking in the region of 10 minutes on foot, with Farringdon located 800m from the site and Moorgate 650m. From Moorgate, additional Underground services area accessible via the Northern line.

306. Additionally, from Farringdon Railway Station, access to the Elizabeth Line is achievable. Access to the Elizabeth Line is taken from Lindsey Street / Long Lane, approximately 350m from the site taking just over 4 minutes on foot. This offers access to Abbey Wood, Shenfield, London Paddington, Maidenhead and Heathrow Terminals 4 and 5.

307. Bus stops are situated on the A1, north of its junction with Beech Street. The bus stops are accessible within a distance of 200m, taking approximately 3-minutes on foot. There is a bus stop on either side of the carriageway, both of which are characterised by a dedicated shelter with seating, and a flag and a post which includes timetable information. Painted bus cages are provided within the carriageway for the waiting bus.

308. By virtue of the location of the site, footways are provided on all of the surrounding roads, measuring no less than 1.8m in width, with the majority of footways exceeding this width, in accordance with the Department for Transport's (DfT's) Inclusive Mobility (2021) guidance.

309. Signalised pedestrian crossing facilities are available at the A1 / B100 Beech Street / Long Lane junction, providing pedestrians with ease of access to surrounding roads. A raised table facility is provided on Bridgewater Street, within the vicinity of its junction with Beech Street, to enable at grade

pedestrian crossing movements to take place. The raised table is also provided in conjunction with tactile paving.

Trip Generation

310. A trip generation forecast has been conducted for the site which identifies the net change in trips that would result from the proposed development. The assessment has used TRICS travel data from similar developments within London with a PTAL rating of 6A-6B which are considered suitable comparator sites. The assessment includes existing and predicted estimates for trips to the site looking at the existing office space and comparing with the proposed co-living space. Three office surveys have been identified for the existing which are deemed comparable.
311. In order to predict the future trip generation for the proposed use of co-living space, the applicant has used one moderately compatible survey site. Whilst generally trip data from additional sites would be expected, in this case, taking into account that there is no other comparable co-living trip data, it is considered acceptable.
312. The Assessment identifies that the existing development as a whole currently generates around 146 trips during the AM peak (8:00-9:00) and 127 trips during the PM peak (17:00-18:00), with a total of 962 daily trips currently being generated. The assessment of the proposed scheme is predicted to generate 60 trips during the AM peak (8:00-9:00) and 43 trips during the PM peak (17:00-18:00), with a total of 423 daily trips currently being generated. This is a decrease of -86 trips during the AM peak (8:00-9:00) and -85 trips during the PM peak (17:00-18:00), with a total decrease of -539 daily trips likely to be generated by these proposals.
313. Notwithstanding the minor concern raised regarding the methodology of the assessment, officers consider that the overall trip generation for the site would be a reduction and reduce the impact on the public highway and is therefore acceptable.

Delivery and Servicing

314. 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.

315. DM 11.5 Parking and servicing standards states on site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded.
316. The proposed development will be car free. As a result, all vehicle trips generated by the development will be associated with delivery and servicing. A mix of double and single yellow line parking restrictions are in place surrounding the site, though it is noted that the length of Beech Street and Bridgewater Street are subject to double yellow line restrictions. Loading restrictions are also present on Beech Street, prohibiting loading at any time or to within certain time periods at the locations covered. No loading restrictions are present on Bridgewater Street.
317. In light of the restrictions on Beech Street (which prohibits loading between the hours of 07:00 and 19:00) it is considered that servicing and deliveries to the site will continue to take place on Bridgewater Street. It is anticipated that there will be 10-15 deliveries a day generated by the site, which can be conducted from Bridgewater Street, which is considered acceptable, subject to a condition which would be attached so that these activities would be restricted within the standard peak hours of 07:00-10:00, 12:00-14:00 and 16:00-19:00. To ensure that no more than 10 to 15 deliveries/servicing trips can take place, a condition would be secured limit the trips to site.
318. The waste collection store would be at ground level facing onto Bridgewater Street. A bin storage area would be located in the basement. The City Cleansing team have been consulted, and confirmed the proposed waste storage and collection facilities to comply the relevant requirements. The waste storage area is to be secured by condition. The servicing time restriction condition includes collection of refuse and recycling.

Cycle Parking

319. London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements published in the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.
320. 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.

321. Within the recently adopted 'London Plan Guidance: Large-Scale Purpose Build Shared Living' document it is noted that cycle parking standards for co-living developments are outlined as being 0.75 spaces per person. The development proposals comprise the construction of 174 co-living spaces, which will house one person per unit. Based on a standard of 0.75 spaces per person, this would equate to a requirement of 131 spaces. The development proposals provide a total of 134 long stay spaces, with a further 12 short stay parking spaces proposed on street for visitor needs. The long stay onsite cycle parking has also been developed to offer a variety of parking types, including Sheffield stands, oversized cycle spaces and two-tier racks, to accommodate all residents' needs. In light of the above, it is considered that the onsite cycle parking provision accords with the prevailing standard for this land use.

322. The level of cycle parking proposed as part of the development meets the minimum requirements based on the London Plan for long stay and short stay parking, as shown in the table below.

London Plan long stay requirements	Proposed long stay	London Plan short stay requirements	Proposed short stay
131	134	5	12

323. Short stay cycle parking would also be provided on Beech Street on private land at the front of the site, which would accommodate visitors and deliveries by bicycle.

324. The long stay cycle parking is proposed at basement level which is accessed via the main Beech Street entrance via stairs and accessible lifts that lead down into the basement, as well as alternative access via the ramp to the rear. The lifts provided would be sufficient in size to accommodate all types of cycle and would have the capacity to accommodate more than one cycle and officers are satisfied that it has sufficient capacity, taking into account the additional ramp which will serve as the main access for the cycle parking.

325. A condition is recommended to secure 134 long stay cycle parking spaces and 12 short stay cycle parking spaces, in line with London Plan policy requirements as detailed above.

Car parking

326. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2040 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.
327. The existing building has a car parking area in the basement. Access is via a crossover from Bridgewater Street followed by a level drop from ground to basement, which falls at a gradient which would be considered significantly steep.
328. The London Plan, Policy D7 on Accessible Housing, states that at least 10% of all new built homes in London must meet the building regulations for the Wheelchair User Dwellings (WUD).
329. Policy T6 of the London Plan, sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking.
330. Policy T6.1 on residential parking, (part G), indicates that parking for disabled people to be provided for proposals that are delivering 10 or more units. The level of provision is as per the following criteria:
- a) For 3% of the dwellings provided, at least one designated disabled persons parking bay per dwelling to be made available from the outset. This proposal has 174 dwellings, thus the policy would expect 5 disabled car parking spaces to be available from the outset.
 - b) For this proposal an additional 7% equates to 12 disabled car parking spaces to be made available, should there be an increase in demand at any point in the future
331. This proposal includes 1 disabled parking space on site, accessed from Bridgewater Street, using the existing vehicle crossover. This would be 4 spaces less than the Policy T6.1 (1) expectation and no provision for the additional spaces for the (2) requirement to deal with the case when there is an increase in demand.
332. The submitted Transport Assessment (TA) justifies this lower provision based on the Department for Transport (DfT) statistics, which shows that CoL has the lowest level of Blue Badges held as a proportion of the population at 1.2%. This figure is then collaborated with most recent Census data which is slightly higher at 1.7%. The TA concludes that the low provision for the disabled car parking should be acceptable based on the findings.
333. DfT statistics on the blue badge scheme, published on the 25th Jan 2022, shows that CoL has the lowest blue badge intake at 1.2 % proportion of the population.

334. The City of London operates the 'red badge parking scheme', facilitating on-street parking for disabled people. It covers people who work in the City and its residents. However there are restrictions on the use of Blue/Red badge permits, which means that permits issued are not guaranteed to fulfil the needs of the disabled users of this development.
335. On-street disabled parking, located nearby, can be used by Blue Badge or Red Badge holding residents and visitors of this development, if the demand is higher than provided within the site.
336. Originally the submission did not include an on-site accessible parking space. Officers have worked with the applicant team to identify possible locations for on-site accessible parking, and the proposed location of one space is the only area that could be identified. Vehicles could not park further down the courtyard ramp, as they would not be able to turn within the site, and would need to therefore perform long reversing manoeuvres, which would not be safe.
337. The proposed basement space is also working hard to accommodate the required level of cycle parking, plant and communal facilities for the co-living development, and it would not be suitable for additional accessible parking alongside these. Furthermore, the existing ramp situation is far from ideal for traversing vehicles to access the basement area.
338. On balance therefore, officers consider the provision of a single accessible parking space on site to be acceptable for the proposed development.

Travel Plan

339. Residential Travel Plans would be secured via the Section 106 agreement. The foundation of the Travel Plan should include measures to support disabled users of this development. Prior to signing of the tenancy contract, each disabled resident should have a tailored travel plan, and be supported through appropriate initiatives. Similarly, disabled visitors of this development could request support to get to/from this site, if public transport does not meet their needs.
340. Not all Underground stations nearby have step free access therefore some disabled users of this development may require additional support. Introducing measures, such as, arranging a pick-up from nearby underground station, or other pre-arranged locations, could form part of the Travel Plan measures.

341. In addition, the applicant is required to monitor the demand for on-street disabled parking spaces coming from their development, and encourage the use of public transport through travel planning measures.
342. Annual surveys to establish the main mode of travel for all users of this development, is required. The findings of the surveys to be compiled on a report, with proposed measures on how to support further the use of sustainable modes of transport. These surveys, along with the residential Travel Plans, will be secured via a Section 106 legal agreement.
343. In addition, the proposed development is car-free, as such a clause in the Section 106 agreement would prohibit any future resident from securing a residential parking permit should they become available in the City of London. A condition is recommended to secure a Disabled Parking Design and Management Plan, detailing the following:
- Include Electric Vehicle Charging Point (EVCP) for the disabled car parking space
 - Accessing the disabled parking bay is via a door. Details of how this is achieved to comply with 'No waiting on the public highway'
 - Health & Safety audit and risk assessment for the disabled user of the car parking space.
 - Allocation criteria for the disabled car parking space
 - Monitoring the use, non-compliance/ enforcement

Management of Construction Impacts on the Public Highway in the local area

344. The proposal would involve a significant amount of demolition and construction works both below and above ground level. This will generate a large number of construction vehicle movements during the overall construction period. The proposed works could therefore have a significant impact on the operation of the public highway in the local area if not managed effectively. The primary concern is public safety but its also must be ensured that construction traffic does not create (or add to existing) traffic congestion or impact on the road safety or amenity of other highway users. The works, if incorrectly managed could also lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality), and objections have been received relating to this.
345. A preliminary Construction Logistic Plan (CLP) has been submitted in support of the planning application. It lacks detail but is a good example of what we are looking for at this stage in the process. A more detailed CLP would be prepared once a Principal Contractor has been appointed, which will need to

be in line with TfLs Construction Logistics Plan Guidance. This should consider the following points:

- Construction vehicle routes to and from the site will need to make the most efficient use of the highway network in the Central London Area. Such routes will require discussion with Highways Management.
- The proposed works are likely to generate a significant amount of workers on the site at any given time. We will expect the Principal Contractor to prepare travel planning guidance to encourage workers to use sustainable transport instead of private motor vehicles.
- Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).
- Traffic congestion is already a significant problem in The CoL, particularly during morning and afternoon/evening peak periods. We will therefore expect construction vehicle movements to be scheduled to avoid 0800 to 0930 and 1600 to 1830 hours on Monday to Friday.
- Details will be required to describe how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.
- The site would be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: <http://www.clocs.org.uk/standard-for-clocs/>

346. The City needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. Therefore a Construction Logistics Management Plan (CLMP) is recommended to be secured by condition to ensure the construction and demolition of the site is in accordance with The London Plan Policy T7 and DM16.1 of the Local Plan. This would be expected to provide a mechanism to manage/mitigate the impacts which the proposed development would have on the local area. The CLMP would need to be approved by officers prior to works commencing on site.

Section 278 Works

347. The applicant is required to enter into a Section 278 Agreement of the Highways Act 1980, prior to the occupation of the site for the following works, but not limited to:

348. Bridgewater Street:

- Reinstatement of the carriageways, incorporating any movement of kerb lines required.
- Reconstruction of footways.
- Decluttering of the footway and removal of redundant furniture
- If viable, addition of accessible parking bay (investigations and implementation).

349. Beech Street:

- Reinstatement of the footways .
- Resurfacing of the carriageways.
- Decluttering of the footway and removal of redundant furniture

350. Development requiring works to the highway following development will be secured through planning obligation to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces. This will also need to include all, but not limited to the amendments outlined above.

Transport and Highways conclusions

351. The proposals are acceptable in transport terms, subject to the recommended planning obligations and conditions below:

352. Condition: Demolition/Construction Logistic Plan (DCLP). The condition shall state that the CLP shall be approved prior to any works starting on site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. It should also restrict HGV movement to and from the site to within the hours of 9:30 to 16:30 Monday to Friday, 8 till 13:00 Saturdays and fully restrict movement on Sundays and Bank Holidays unless agreed with the CoL in advance.

353. Condition: Delivery/Serviceing plan

354. A condition requiring the provision of 134 long stay cycle parking spaces, 12 short stay cycle parking for the entire development, designed to London Cycle Design Standards and the ongoing retention of these facilities, details of which will need to be submitted and approved, and approval should be reserved by condition.

355. Condition: submission of Parking Design and Management Plan

356. Section 106 - no parking permits for future residents (unless a red badge holder)
357. A Section 106 planning obligation to secure a residential Travel Plan (TP) for the development, including personal travel plans for those with additional access requirements.
358. A Section 278 agreement to secure the cost of public highway and public realm improvement works in the general vicinity of the site. These works would include but are not limited to repaving of the carriageway directly outside the site on Bridgewater Street and Beech Street.
359. Section 278 highways remedial works - to ensure if any damage is done on the public highway that the applicant pays to reinstate.
360. **Amenity**

Policy Context

361. Local Plan Policies CS21 (Housing) and DM21.3 ('Residential Environment') and draft City Plan policies S3 and HS3, requires amenity of existing residents in identified residential areas to be protected; and The surrounding area largely residential.
362. Local Plan policy DM15.7 and Draft City Plan policy HL3 require noise pollution to be considered.
363. Local Plan policy DM10.7, draft City Plan policy DE8, and London Plan policy D6 considers impact of development on existing daylight and sunlight of residential properties.
364. Objections have been received relating to noise and disturbance from the proposed Co-Living use, in particular resulting from the external areas. Objections also refer to loss of privacy, and loss of daylight and sunlight to their residential properties resulting from the proposed extension.

Noise and disturbance

365. Neighbouring residential occupants have raised concerns relating to noise impacts resulting from the proposed co-living development, and the publicly accessible cafe and co-working space at ground level, which the submitted. Draft Operational Management Plan and Planning Statement suggest could be used for as yet unspecified events.

366. Firstly, noise generated by residents living at their home is not considered harmful, this is a residential area, and noise from general residential activity is to be expected and no unreasonable impacts are likely to result to neighbouring amenity. Notwithstanding, as is required by Policy H16, an operational management plan has been submitted, which includes measures of how management would control the potential for residents to generate unreasonable levels of noise which could result in harmful disturbance to neighbouring residents.
367. Turning to the objections regarding noise from events within the publicly accessible areas of ground floor space (which includes co-working and a cafe), which the applicant states will be used for events, which could include live music, educational talks as well as flexible everyday working/creating stations. Officers do not consider this an inherently noisy use, and any noise outbreak can be controlled with suitable soundproofing of the building. A condition is also recommended that no live or recorded music shall be played at such a level that it can be heard outside the premises or within any residential or other premises in the building.
368. A Noise and Vibration Impact Assessment (Format, February 2024) report has been submitted. The report generally assesses the level of noise internally within the proposed development, but also makes an initial assessment regarding potential plant noise and ultimately concludes this to be acceptable, subject to later design stages.
369. Environmental health officers have been consulted, and have raised no concerns, subject to several conditions that have been recommended, including: controlling the hours of use of external areas, no amplified music in external areas or to be audible from outside the premises, restricted overnight and Sunday deliveries, and details to be submitted for plant equipment. Furthermore, conditions are recommended to ensure that private co-living units are adequately sound-attenuated to ensure acceptable conditions for future residents.
370. Objections have been received relating to noise emanating from the external areas. Use of the terrace and courtyard would be restricted between 10pm and 7am the following morning, and no amplified music would be allowed to be used in these areas at all, as a condition of development. Considering the relative small size of the proposed roof terrace together with the restricted hours, officers do not consider the opportunity for large gathering or parties are likely to arise, which could result in significant levels of noise and disturbance to neighbours. Furthermore, the draft Operational Management Plan states that the on site security, staff and management, who will have a

presence 24 hours a day, 7 days a week, will actively manage any disruptive noise or anti-social behaviour that does arise, and this is considered acceptable. The final operational management plan would be secured by Section 106 Agreement.

Daylight and Sunlight Impact Assessment

371. 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.
372. Local Plan 2015 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.
373. Draft City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby dwellings and other sensitive receptors, including open spaces, is appropriate for its context and provides acceptable standards taking account of the Building Research Establishment's guidelines.
374. 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 2040 states when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.
375. Daylight has been assessed using both the Vertical Sky Component (VSC) and No Sky Line (NSL), also known as Daylight Distribution, tests these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assessed the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or NSL guidelines are not met.
376. The BRE criteria states that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experience a 20% or more reduction). In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).
377. Officers note that if the existing VSC of a window is less than 27%, it is likely that it is already poorly naturally lit and is therefore sensitive to further change.

378. Both the London Plan 2021 and draft City Plan 2040 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.

Methodology

379. A daylight and sunlight report has been submitted (Anstey Horne, February 2024) and its findings have been interrogated by BRE as part of an independent review (BRE, 12 July 2024) of the report. The report analyses loss of daylight and sunlight to existing properties using BRE Report BR 209 'Site layout planning for daylight and sunlight: a guide to good practice', third edition, June 2022.

380. Loss of Daylight: Where the obstruction angle is greater than 25°, or not relevant, or the distance criterion is not met, more detailed calculations should be performed. To assess the impact on the amount of diffuse daylight entering existing buildings, the BRE Report uses two criteria:

- a) The vertical sky component (VSC) on the window wall, and
- b) Daylight distribution in the existing rooms, based on the areas of the working plane which can receive direct skylight before and after development (the no sky line methodology).
 - The diffuse daylighting of an existing building may be adversely affected if the vertical sky component or daylight distribution results are below the guidelines. For each test the guidelines operate on the general principle that if the amount of daylight is reduced to less than 0.8 times its former value (i.e. there will be more than a 20% loss) the reduction will be noticeable to the building's occupant.
 - The loss of daylight guidelines within the BRE Report are intended for use for habitable rooms (i.e. living rooms, kitchens, dining rooms and bedrooms) in nearby dwellings.

381. Loss of Sunlight to Windows: The BRE Report recommends that in existing buildings sunlight should be checked for all main living rooms of dwellings, and conservatories, if they have a window facing within 90° of due south. If the centre of the window can receive more than one quarter of annual probable sunlight hours (APSH), including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March, then the room should still receive enough sunlight. Any reduction in sunlight access below this level should be kept to a minimum. If the available sunlight hours are both less than the amount above, less than 0.8 times their former value, and annual probable sunlight hours more than 4% lower than previously, then the sunlighting of the existing dwelling may be adversely affected. Annual and winter probable sunlight hours are appropriate methods

to assess loss of sunlight to an existing building due to a proposed development. This guideline is also used in the Anstey Horne assessment, Appendix D of which gives probable sunlight hours 'before' and 'after' for the surrounding windows analysed.

382. Loss of Sunlight to Gardens: The assessment doesn't include any existing gardens or open spaces in the analysis of loss of sunlight, which is acceptable because, although there is an external amenity space to the north of Ben Jonson House which has a green area at its western end in the vicinity of the proposed development with the potential for sunlight to be slightly impacted, sunlight to the overall amenity space taken as a whole is not considered to be affected.
383. Environmental Impact Assessment: Appendix H of the BRE Report gives advice on using the loss of daylight and sunlight guidelines as the basis for an environmental impact assessment. Where the loss of skylight or sunlight fully meets the guidelines in the document, the impact is assessed as negligible or minor adverse. Where the loss of light is well within the guidelines, or only a small number of windows or limited area of open space lose light (within the guidelines), a classification of negligible impact is more appropriate. Where the loss of light is only just within the guidelines, and a larger number of windows or open space area are affected, a minor adverse impact would be more appropriate, especially if there is a particularly strong requirement for daylight and sunlight in the affected building or open space. Where the loss of skylight or sunlight does not meet the guidelines, the impact is assessed as minor, moderate or major adverse.

Results of Assessment and BRE independent review

384. A total of 5 buildings have been considered as sensitive receptors. The following properties are assessed:
- 6-9 Bridgewater Square
 - 10-15 Bridgewater Square
 - Ben Jonson House
 - Defoe House
 - Shakespeare Tower
385. The headline adherence rates for the site are as follows:
- 382 (82%) of the 464 windows tested for VSC achieve the guideline values
 - 256 (94%) of the 271 rooms tested for daylight distribution achieve the guideline values
 - 69 (86%) of the 80 rooms tested for APSH achieve the guideline values on an annual basis and 60 (75%) achieve the guideline values on a winter basis.

386. A more detailed breakdown of the analysis follows:
387. **6-9 Bridgewater Square:** This residential building, also named Bridgewater House, is immediately to the north of the proposal site and has south elevation windows that face into the courtyard which this building forms with 45 Beech Street and Bryer Court. The assessment has analysed 32 windows at 6-9 Bridgewater Square facing the proposed development.
388. Results suggest that 11 (34%) of the 32 windows assessed achieve the guideline values for VSC by retaining greater than 0.8 times their former value. A further 9 of these windows achieve a factor former value of 0.70 or greater and therefore only fall slightly short of the guidelines.
389. All first to fifth floor windows analysed that light bedrooms would be affected, and the impact is assessed as:
- major adverse for four windows,
 - moderate adverse for nine windows,
 - minor adverse for three windows.
 - A window to a fourth-floor kitchen would experience a minor adverse impact.
 - There are also four windows on the seventh floor that would have a minor adverse impact, three lighting bedrooms and the other a living room.
390. Officers note that many of the windows achieve low daylight levels in the existing condition and are therefore sensitive to further change. For example on the first floor, the absolute existing VSCs range from 5.93% to 7.65% in the existing condition and from 3.27% to 5.29% in the proposed condition. Whilst these reductions are small in absolute terms, they manifest as disproportionately large relative reductions.
391. The ranges of impacts are higher on the upper floors, for example at second to fifth floor level absolute existing VSCs range from 7.38% to 19.74%, and from 4.24% to 15.49% in the proposed condition, however none of the rooms tested at first to fifth floor level had an existing VSC of 27% or above as existing and so these are already likely to be poorly lit. All of these windows, bar two serving kitchens on the fourth and fifth floors, are serving bedrooms.
392. No sky line (NSL) results are reported for 23 rooms at this property and the results suggest that eight rooms would meet the NSL guideline, whereas the other fifteen failing to meet the guideline would experience relative reductions in the percentage area able to receive direct skylight between 3% and 56%, compared to the 20% guideline.

393. All first to fifth floor rooms analysed bar one would be affected. However, most of these are bedrooms and therefore less important for daylight distribution. There is another bedroom on the seven floor that would have its daylight distribution impacted. Nevertheless, daylight distribution would be significantly affected for two kitchens, one on the fourth floor with a major adverse impact and another on the fifth floor with a moderate adverse impact. These two kitchens appear to also be served by additional windows on different elevations however.
394. The overall impact on daylight to 6-9 Bridgewater Square is assessed as major adverse because a large number of windows are affected and in some cases the loss of light is substantially outside the guidelines.
395. With regards loss of sunlight, Anstey Horne have reported results for 32 windows facing within 90 degrees of due south that have a view of the proposed development. The results are given for each individual window as well as for the whole room where a room is served by more than a windows, resulting in 23 rooms analysed. Considering the results at room level, 11 rooms would fully meet the probable sunlight hours guidelines, whilst eight other rooms would experience a loss both in annual and winter sunlight, three other rooms would experience a loss in annual sunlight and one other in winter sunlight. However, none of the rooms that would have their sunlight affected appears to be a living room and loss of sunlight to these windows is therefore less relevant. Therefore, because the guidelines for loss of sunlight are applicable to windows that light living rooms, a negligible impact on sunlight to windows at 6-9 Bridgewater Square is assessed.
396. In Summary, there would be a major adverse impact to 6-9 Bridgewater Square with regards to daylight, however, the windows and rooms in the south elevation of 6-9 Bridgewater Square face directly into the courtyard and therefore onto the proposed development site. The daylight levels within the building are low in the existing condition, particularly on the first to fifth floor levels, where the impact would be greatest. Given the densely developed city centre environment and the sensitivity of these windows and rooms to change, any meaningful development would cause reductions outside of the guidelines.
397. **Ben Johnson House:** This residential neighbouring property is located to the east of the development site and the internal layouts have been based on information obtained from the Barbican Living website.
398. The results show that 7 (70%) of the 10 windows assessed achieve the guideline values for VSC by retaining greater than 0.8 times their former

value. The other three failing to meet the guidelines would experience relative reductions in VSC values between 27% and 36%, compared to the 20% guideline, with retained VSC values between 15.1% and 23.1%. Two of these windows, one on the second floor and the other on the third floor, would experience a moderate adverse impact, whilst the other window affected would experience a minor adverse impact.

399. Officers note that each of the windows which falls short of the guideline values serves a room which is also served by at least two other windows which are shown to meet the guideline values. Where multiple windows serve the same room, the BRE states that a weighted mean average based upon window sizes can be applied. For two of the three windows which fall short of the guideline values, the weighted mean average VSC for the rooms meets the guideline.
400. No sky line (NSL) results are reported for the three rooms at this property, which fall below the VSC guidance, and they are all bedrooms. The results suggest that all rooms analysed would meet the NSL guideline, with no significant impact.
401. Based on the results, the overall impact on daylight to Ben Jonson House is assessed as minor adverse because a small number of windows are affected.
402. With regards loss of sunlight, Anstey Horne have reported results for 10 windows facing within 90 degrees of due south that have a view of the proposed development. The results are given for each individual window as well as for the whole room where a room is served by more than a windows, resulting in three rooms analysed in total. Notwithstanding that all windows analysed appear to light bedrooms which are less relevant in terms of loss of sunlight, all windows and rooms analysed would fully meet the probable sunlight hours guidelines. A negligible impact on sunlight to windows at Ben Jonson House is therefore assessed.
403. **10-15 Bridgewater Square:** This residential neighbouring property is located to the north-east of the development site and the internal layouts have been based on information obtained from local authority records. 59 windows serving 36 rooms have been assessed. The results confirm that all 59 (100%) of the 59 windows assessed for VSC meet or exceed the guideline values.
404. The daylight distribution results demonstrate that all 36 (100%) of the 36 rooms assessed achieve the guideline values with many of the rooms experiencing no reduction in lit area. The overall impact to daylight is negligible to this property.

405. 25 rooms would fully meet the probable sunlight hours guidelines, whilst the other 11 would experience a loss in winter sunlight. However, none of the rooms that would have their sunlight affected appears to be a living room and loss of sunlight to these windows is less relevant. Therefore, because the guidelines for loss of sunlight are applicable to windows that light living rooms, a negligible impact on sunlight to windows at 10-15 Bridgewater Square is assessed.
406. **Defoe House:** This residential neighbouring property is located to the south of the development site and the internal layouts have been based on information obtained from the Barbican Living website.
407. The assessment has analysed 291 windows at Defoe House facing the proposed development, all of which appear to light bedrooms. Results suggest that 242 windows would meet the VSC guidelines, whereas the other 49 failing to meet the guidelines would experience relative reductions in VSC values between 21% and 62%, compared to the 20% guideline. However, all affected windows appear to be small fanlight windows above a balcony door and the rooms these windows serve also have other larger windows which meet the VSC guidelines. Since these windows light the same area of each room they serve, the area weighted average VSC can be calculated as recommended by the BRE Report. Although Anstey Horne have not used this approach in their assessment, area weighted average VSC values can be determined based on the layouts included in their assessment as well as data collected during the BRE site visit. The results of this additional calculation (carried out by BRE in their review) indicate relative reductions in area weighted average VSC values of up to 7%, compared to the 20% guideline, which suggests that loss of VSC to each room as a whole would comfortably meet the guideline.
408. No sky line (NSL) results are reported by Anstey Horne for 164 rooms at this property, all bedrooms. Results suggest that all rooms analysed would meet the NSL guideline.
409. Based on the results in the Anstey Horne assessment, the overall impact on daylight to Defoe House is assessed as negligible. Loss of sunlight to Defoe House is not relevant since all windows facing the proposed development do not face within 90 degrees of due south.
410. **Shakespeare Tower:** No Impacts identified, achieves full adherence to the BRE guidelines for both daylight and sunlight.

Daylight and Sunlight Conclusions

411. The scope of the submitted assessment is appropriate, and all nearby relevant buildings have been included in the analysis. Cumulative impacts have not been considered, which is considered appropriate since no other planning applications could be identified in the vicinity of the proposal site.

BRE have carried out an independent review of the assessment and have confirmed this.

412. The results of the daylight and sunlight impact assessments are summarised below:

- **6-9 Bridgewater Square**
Major adverse impact on daylight
Negligible impact on sunlight to windows
- **Ben Jonson House**
Minor adverse impact on daylight
Negligible impact on sunlight to windows
- **10-15 Bridgewater Square**
Negligible impact on daylight
Negligible impact on sunlight to windows
- **Defoe House** - Negligible impact on daylight
- **Shakespeare Tower** - Negligible impact on daylight

413. The assessment confirms that properties within 6-9 Bridgewater Square will be most impacted as a result of the proposal with regards to loss of daylight, overall receiving a major adverse impact. Most affected are those south facing windows directly towards the application site from first to fifth floor levels and the vast majority of those affected are bedroom windows, for which daylight distribution is considered to be less important in the BRE guidance. Many of these windows also have limited daylight as the existing starting point, and are therefore comparatively sensitive to further change.

414. Officers note however that daylight distribution would be significantly affected for two kitchens, one on the fourth floor with a major adverse impact (VSC change factor of 0.74, and NSL change factor of 0.54) and another on the fifth floor with a moderate adverse impact (VSC change factor of 0.8, and NSL change factor of 0.67) compared to the guideline target factors of 0.8.

415. The assessment also confirms a minor adverse impact on daylight to Ben Johnson House, specifically to three windows, one on the 2nd floor (VSC change factor of 0.6), one on the third floor (VSC change factor of 0.65) and one on the fifth floor (VSC change factor of 0.73), compared to the guideline target of 0.8. However each of the windows which falls short of the guideline values serves a room which is also served by at least two other windows. For two of the three windows which fall short of the guideline values, the weighted mean average VSC for the rooms does meet the guideline. Therefore the minor adverse impacts identified, when considered on balance of all other considerations, are considered to be acceptable in this case.

416. Considering the majority of adversely impacted windows are bedrooms, the existing poor daylighting factors, and the fact this is a tight knit urban environment, although some minor and major adverse impacts have been identified, in this case officers consider this to be acceptable overall, especially when considering the other merits of the application, including the

retention of the majority of the existing building, and its redevelopment as housing, including a payment in lieu towards affordable housing.

Loss of Privacy

417. Some concern has been raised to overlooking from the proposed roof terrace. The proposed level 9 roof terrace would not directly overlook any existing residential properties or amenity areas. Furthermore, screening would be provided as edge planting, details of which (including maintenance) are recommended to be secured by condition. Officers do not consider the proposed roof terrace would result in a loss of privacy to neighbouring occupants.
418. The proposed new windows in the upper-level extension would not create significantly different overlooking opportunities than those existing below. The proposed change of use, whilst may result in different patterns of use of the building, would not result in a significant loss of privacy to neighbouring properties. Although some of the window-to-window distances are quite close, this is the existing situation, and in this tight grain urban environment some interlooking between properties is to be expected.
419. The proposal is therefore not considered to result in unreasonable loss of privacy to neighbouring occupants.

Amenity conclusions

420. Overall, there would be no unreasonable impacts to the amenity of neighbouring occupiers, in line with the aforementioned policies.
421. The proposed development would have some minor and major adverse impacts upon daylight and sunlight to surrounding residential properties, however considering the majority of adversely impacted windows are bedrooms, the existing poor daylighting factors, and the fact this is a tight knit urban environment, officers consider the amenity impacts to be acceptable. Concerns relating to noise and disturbance arising from the proposed use would be controlled through several conditions and the operational management plan, which would be secured through a Section 106 agreement.

Ecological Impacts

422. Chapter 15 of the NPPF relates to preserving and enhancing the natural environment. The environments is one of the three overarching objectives that define sustainable development.
423. Policy CS15 of the adopted City Plan (2015) paragraph 4(vi) states the need to enhance biodiversity and provide for its conservation and enhancement,

particularly for the City's flagship species and the City's priority habitats. Policy OS3 of the draft City Plan 2040 requires development to incorporate measures to enhance biodiversity, including measures recommended in the City of London Biodiversity Action Plan (BAP, 2021) in relation to particular species or habitats and action plans.

424. A preliminary ecological appraisal report (Maydencroft Limited, February 2024) has been submitted. A site survey was carried out on 25th January 2024. The habitats on Site include; buildings and built linear features and have the potential to support; roosting bats and nesting birds.
425. The report concluded that, subject to recommendations for further surveys, the proposed works on Site are not considered likely to impact any internationally, nationally or locally designated sites. A bat roost inspection by use of an endoscope and at least one bat dusk emergence survey of the building is recommended in the report, to determine if the building is being utilised by roosting bats.
426. The applicant has therefore submitted the results bat roost inspections by use of an endoscope and dusk emergence survey (Maydencroft, 28 August 2024). The endoscope inspection was carried out on 15th July 2024 and has resulted in the assessed suitability of the building for roosting bats being upgraded from low to moderate, as such two emergence surveys are required.
427. A bat roost emergence survey was carried out on 23rd July and another on 21st August 2024. A single pipistrellus sp. bat was heard by the surveyor during the July survey. The bat was only heard briefly and was a considerable distance from the building. No bats were seen emerging or in the surrounding area in either survey, including in footage from infrared cameras which was analysed after the survey and no bats were observed.
428. It is therefore considered unlikely that the proposed development would affect roosting bats. Notwithstanding the ecologist has recommended that the works proceeds with caution and that if any indication of roosting bats are found then the works should cease immediately and advice from the ecologist should be sought.
429. Bats are included in the list of species in Schedule 5 of the Wildlife and Countryside Act 1981, which makes it illegal to intentionally capture, injure, or kill bats. It also protects their roosts, meaning it is illegal to damage or destroy a place used by bats for breeding or resting, even if bats are not present at the time.
430. Bats are also defined as a target species in the City of London Biodiversity Action Plan (2021).
431. Mitigation measures for the proposed development include; - Works to be undertaken outside of bird nesting season to avoid disturbance to nesting birds. If undertaken during bird nesting season, an ecologist must first

conduct a nesting bird check. - Sensitive lighting for foraging and commuting bats.

432. Subject to the proposed mitigation measures, which would be secured by condition, the impact upon wildlife and ecology is considered to be acceptable, in line with Policy C15 of the City Plan, the City Biodiversity Action Plan and Policy OS3 of the emerging draft City Plan 2024.

Air Quality

433. Policy DM 15.6 Air quality requires applicants to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment. Developers will be encouraged to install non-combustion low and zero carbon energy technology.
434. The Air Quality Officer has been consulted and confirmed no objections to the proposed development following submission of additional information relating to the proposed extractor flue for the emergency generator.
435. The proposed development would be car free as defined within Air Quality Neutral guidance, and the development is to be connected to the CitiGen district heat network which reduces the need for on-site combustion plant. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment. Plans have been submitted showing the location of the generator flue (PL222), this is 1m above the roof level and not located close to any air intakes.
436. The recommended conditions are for additional details and a restriction on the use of the backup generator in emergencies and for testing only and that flues must terminate at an appropriate height, as well as a requirement to sign up for NRMM.

Planning Obligations and Community Infrastructure Levy

437. 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.
438. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
439. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging

schedule. 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).

440. 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	£134,736.00	£129,347.00	£5,389.00

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	£126,315.00	£119,999.00	£6,316.00
City Planning Obligations			
Affordable Housing	£8,510,568.00	£8,425,462.00	£85,106.00
Local, Training, Skills and Job Brokerage	£8,421.00	£8,337.00	£84.00
Carbon Reduction Shortfall (<i>as designed</i>) <i>Not indexed</i>	£125,918	£125,918	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£50,000.00	£50,000.00	£0
S106 Monitoring Charge	£3,000	£0	£3,000
Total liability in accordance with the City of London's policies	£8,824,222.00	£8,729,716.00	£94,505.00

City's Planning Obligations

441. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. 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 (*Highways Schedule of Condition Survey, site access, consents, licences etc*)
- Local Procurement Strategy
- Local Training Skills and Job Brokerage Strategy (*Construction*)
- Travel Plan (including a Travel Plan for Disabled Users)
- Construction Monitoring Cost (£30,935 for first year of development and £25,760 for subsequent years)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Section 278 Agreement (*CoL*)
- Co-Living Accommodation (*Operational Management Plan*)
- Prohibition against parking permits for future residents of the development
- Viability Review
- Marketing and Lettings Management plan

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

443. The scope of the s278 agreement may include, but is not limited to:

Bridgewater Street

- Reinstatement of the carriageways, incorporating any movement of kerb lines required.
- Reconstruction of footways.
- Decluttering of the footway and removal of redundant furniture
- If viable, addition of accessible parking bay (investigations and implementation).

Beech Street

- Reinstatement of the footways.
- Resurfacing of the carriageways.
- Decluttering of the footway and removal of redundant furniture

Monitoring and Administrative Costs

444. 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.

445. 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.

Public Sector Equalities Duty

446. When considering the proposed development, the Public Sector Equality Duty requires the City of London Corporation 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.

447. 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.

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

449. 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.

450. This application has been assessed against the Equality Act 2010 and any equality impacts identified. It is the view of officers that a decision to grant planning permission, subject to the recommended conditions, would not disadvantage those who are protected under the Equality Act 2010.

451. In relation to policy GG1 of the London Plan, the proposals are 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

452. 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”).
453. Officers have given consideration towards the interference with the right to respect for one’s private and family life (Article 8 of the ECHR) or peaceful enjoyment of one’s possessions (Article 1 of Protocol 1), including by causing harm to the amenity of those living in nearby residential properties. Officers have assessed the level of harm that would result to neighbouring amenity to be acceptable, and therefore do not consider the proposal would result in an infringement of the ECHR as a result of the proposal.
454. Therefore, it is the view of officers that there would be no infringement of Article 8 or Article 1 of Protocol 1 of the ECHR as a result of refusal of planning permission.

Conclusions

455. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the National Planning Policy Framework, and the emerging Local Plan and considering all other material considerations.
456. The principle of development is acceptable, the office use has been demonstrated to no longer be viable at the site, and this location is considered to be suitable for co-living residential development in principle. The quality of accommodation and communal facilities to be provided is considered to be acceptable, whilst contributing The City’s annual housing targets (equivalent to 97 conventional housing units) and increasing housing choice for Londoners, in line with the aforementioned policies.
457. Sustainability principles have been followed, the existing building would be largely retained and extended to be repurposed and the proposal is policy compliant with regards to Carbon Optioneering, Whole Life Carbon, Urban greening and biodiversity net gain. The retention and reuse of the existing building as a form of housing is a planning merit to which officers assign a great deal of weight.
458. The proposed design has evolved in conjunction with officers since an early pre-application stage, and it is considered that the architectural design of the building would be compatible with the existing context in terms of scale and massing and be read as a well-layered piece of design, which would improve the building's contribution to the local townscape. Furthermore the proposal would preserve the significance (via change in the setting) of designated and non-designated heritage assets and an appreciation of them.

459. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate co-living housing, which would increase housing stock and housing choice for Londoners. The proposals align with the function of the City to accommodate substantial growth in accordance the relevant policies.
460. The proposed development would have some minor and major adverse impacts upon daylight and sunlight to surrounding residential properties, however considering the majority of adversely impacted windows are bedrooms, the existing poor daylighting factors, and the fact this is a tight knit urban environment, in this case officers consider the amenity impacts to be acceptable when considered on balance with the other merits of the application. Concerns relating to noise and disturbance arising from the proposed use would be controlled through several conditions and the operational management plan, which would be secured through a Section 106 agreement.
461. The impact upon air quality, wildlife and ecology is considered to be acceptable, in line with relevant policies, subject to the recommended conditions.
462. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

APPENDIX A: BACKGROUND PAPERS

Plan titled:

Received 20 August 2024:

Proposed Ground Floor Plan: 22107-AHMM-XX-GF-DR-A-PL120 Rev.P05

Proposed South Elevation: 22107-AHMM-XX-XX-DR-A-PL220 Rev.P02

Received 2 August 2024:

Basement Plan Rooms Layout: 10460-IRB-XX-B1-D-M-5001 Rev.P01

Received 9 July 2024:

Proposed West Elevation: 22107-AHMM-XX-XX-DR-A-PL222 Rev.P02

Received 1 May 2024:

Proposed Level 02 Floor Plan: 22107-AHMM-XX-02-DR-A-PL122 Rev.P01

Proposed Roof Plan: 22107-AHMM-XX-RF-DR-A-PL126 Rev.P01

Proposed Level 03-05 Floor Plan: 22107-AHMM-XX-ZZ-DR-A-PL127

Proposed Section AA: 22107-AHMM-XX-XX-DR-A-PL320 Rev.P01

Proposed Section BB: 22107-AHMM-XX-XX-DR-A-PL321 Rev.P01

Proposed Section CC: 22108-AHMM-XX-XX-DR-A-PL322

Proposed Section DD: 22109-AHMM-XX-XX-DR-A-PL323

Proposed Section EE: 22110-AHMM-XX-XX-DR-A-PL324

Proposed East Elevation: 22107-AHMM-XX-XX-DR-A-PL221 Rev.P01

Proposed North Elevation: 22107-AHMM-XX-XX-DR-A-PL223 Rev.P01

Core Plan Layout – typical level: 22170-AHMM-A-SK089

Public Realm Plan: EAS-ZZ-DR-L-002

Courtyard Plan: EAS-ZZ-DR-L-002

Roof Terrace Plan: EAS-ZZ-DR-L-003

Planting Plan: EAS-ZZ-DR-L-004

Key Plan: 22107-AHMM-XX-RF-DR-A-PL150

Existing West Elevation: 22107-AHMM-XX-XX-DR-A-PL202 Rev.P01

Demolition West Elevation: 22107-AHMM-XX-XX-DR-A-PL212 Rev.P01

Received 19 February 2024:

Proposed Site Plan: 22107-AHMM-XX-RF-DR-A-PL003 Rev.P01

Site Location Plan: 22107-AHMM-XX-RF-DR-A-PL004

Proposed Basement Plan: 22107-AHMM-XX-B1-DR-A-PL092

Proposed Level 01 Floor Plan: 22107-AHMM-XX-01-DR-A-PL121

Proposed Level 06-07 Floor Plan: 22107-AHMM-XX-01-DR-A-PL123

Proposed Level 08 Floor Plan: 22107-AHMM-XX-01-DR-A-PL124

Proposed Level 09 Floor Plan: 22107-AHMM-XX-01-DR-A-PL125

Bay Study Base: 22107-AHMM-XX-XX-DR-A-PL250

Bay Study Top: 22107-AHMM-XX-XX-DR-A-PL251
Unit Layout Type 01 and Type 02 M4: 22107-AHMM-XX-ZZ-DR-A-PL400
Unit Layout Type 03 M4: 22107-AHMM-XX-ZZ-DR-A-PL401
Unit Layout Type 04 and Type 05 M4: 22107-AHMM-XX-ZZ-DR-A-PL402
Unit Layout Type 06 M4: 22107-AHMM-XX-ZZ-DR-A-PL403
Accessible Unit Type 01 M4: 22107-AHMM-XX-ZZ-DR-A-PL404
Accessible Unit Type 02 M4: 22107-AHMM-XX-ZZ-DR-A-PL405
Accommodation Schedule: 22107-AHMM-XX-XX-SC-A-PL900 Rev.P07
Existing Block Plan: 22107-AHMM-XX-RF-DR-A-PL001
Existing Site Plan: 22107-AHMM-XX-RF-DR-A-PL002
Existing Basement Plan: 22107-AHMM-XX-B1-DR-A-PL090
Existing Ground Floor Plan: 22107-AHMM-XX-GF-DR-A-PL100
Existing Level 01 Floor Plan: 22107-AHMM-XX-01-DR-A-PL101
Existing Level 02 Floor Plan: 22107-AHMM-XX-01-DR-A-PL102
Existing Level 03 Floor Plan: 22107-AHMM-XX-01-DR-A-PL103
Existing Level 04 Floor Plan: 22107-AHMM-XX-01-DR-A-PL104
Existing Level 05 Floor Plan: 22107-AHMM-XX-01-DR-A-PL105
Existing Level 06 Floor Plan: 22107-AHMM-XX-01-DR-A-PL106
Existing Level 07 Floor Plan: 22107-AHMM-XX-01-DR-A-PL107
Existing Roof Plan: 22107-AHMM-XX-RF-DR-A-PL108
Existing Section AA: 22107-AHMM-XX-XX-DR-A-PL300
Existing Section BB: 22107-AHMM-XX-XX-DR-A-PL301
Existing South Elevation: 22107-AHMM-XX-XX-DR-A-PL200
Existing East Elevation: 22107-AHMM-XX-XX-DR-A-PL201
Existing North Elevation: 22107-AHMM-XX-XX-DR-A-PL203
Demolition Basement: 22107-AHMM-XX-B1-DR-A-PL091
Demolition Ground Floor Plan: 22107-AHMM-XX-GF-DR-A-PL110
Demolition Level 01: 22107-AHMM-XX-01-DR-A-PL111
Demolition Level 02: 22107-AHMM-XX-01-DR-A-PL112
Demolition Level 03: 22107-AHMM-XX-01-DR-A-PL113
Demolition Level 04: 22107-AHMM-XX-01-DR-A-PL114
Demolition Level 05: 22107-AHMM-XX-01-DR-A-PL115
Demolition Level 06: 22107-AHMM-XX-01-DR-A-PL116
Demolition Level 07: 22107-AHMM-XX-01-DR-A-PL117
Demolition Level 08: 22107-AHMM-XX-01-DR-A-PL118
Demolition Section AA: 22107-AHMM-XX-XX-DR-A-PL310
Demolition Section BB: 22107-AHMM-XX-XX-DR-A-PL311
Demolition South Elevation: 22107-AHMM-XX-XX-DR-A-PL210
Demolition East Elevation: 22107-AHMM-XX-XX-DR-A-PL211
Demolition North Elevation: 22107-AHMM-XX-XX-DR-A-PL213

Document titled:

Design and Access Statement (AHMM, January 2024)

Design and Access Statement Addendum #2 (AHMM, August 2024)
 Planning Statement (DP9, February 2024)
 Transport Statement (Markides Associates, February 2024)
 Transport Statement Addendum (Markides Associates, 20 August 2024)
 Swept Path Analysis Large Car: 23232-MA-XX-XX-DR-C-7011 Rev.P01
 Outline Construction Logistics Plan (Markides Associates, February 2024)
 Draft Delivery and Servicing Plan (Markides Associates, February 2024)
 Daylight and Sunlight to Neighbouring Properties (Anstey Horne, February 2024)
 Daylight and Sunlight to Proposed Accommodation (Anstey Horne, February 2024)
 Review of Daylight and Sunlight Assessments (BRE, July 2024)
 Stage 2 WLCA Report (Circle, January 2024)
 Sustainable Design and Construction Statement (Introba, February 2024)
 Energy Strategy Report (Introba, February 2024)
 Energy Technical Note Issue 2.0 (Introba, 12 August 2024);
 Energy Performance Certificate 45 Beech Street dated 23 July 2024;
 Carbon Optioneering Supporting Note dated 8 August 2024;
 Carbon Options Tool (Hilson Moran)
 Carbon Options Tool Dashboard (Hilson Moran)
 Circular Economy Statement (Scotch Partners, January 2024)
 Air Quality Assessment (Air Quality Consultants, January 2024)
 Statement of Community Involvement (London Communications Agency, February 2024)
 Preliminary Ecological Appraisal and BNG (ITPEnergised, February 2024)
 Bat Emergence Interim Report (Maydencroft, July 2024)
 Bat Emergence Survey Report (Maydencroft, August 2024)
 Heritage, Townscape & Visual Impact Assessment (The Townscape Consultancy, February 2024)
 Financial Viability Assessment (DS2, January 2024)
 Review of 'Viability Report' (BNP, March 2024)
 Payment in-lieu of affordable housing letter (DS2, November 2023)
 Payment in-lieu of affordable housing letter (DS2, May 2024)
 Review of payment in-lieu of affordable housing (BNP, March 2024)
 Further response to review of payment in-lieu of affordable housing (BNP, June 2024)
 Fire Statement London Plan (Artec Fire, January 2024)
 Fire Statement Gateway One Rev.01 (Artec Fire, February 2024)
 Drainage Strategy Report (Whitby Wood, February 2024)
 Response to LLFA Technical Note (Whitby Wood, 1 May 2024)
 Flood Risk Assessment (Whitby Wood, February 2024)
 Draft Delivery and Servicing Plan (Markides Associates, February 2024)
 Noise and Vibration Assessment (Format, February 2024)
 Draft Co-Living Operational Management Plan (HubCap, February 2024)

List of neighbouring objections 24/00176/FULL

- Fred Rodgers
- Dr Henry Irwig
- Ms WahFong Dart
- Dr Robin Callender Smith
- Mrs Jill Jones
- Mr Simon Ricketts
- Mr Simon Martner
- Mr Christopher Makin
- Dr Jane Bickerton
- Dr Stephen Lubell
- Mr John Taysum
- Mark Ormrod
- Jeff Hennessey
- Ms Mary Gilchrist
- Helen Sachs
- Mr Richard Walter
- Mrs Alexander Wilson
- Mary Gilchrist
- Dr Alexander Wilson
- Dr Alexander Wilson
- Mr Alex Castle
- Ms Elizabeth Fothringham
- Ms Helena Twist
- Miss Rebecca Smithers
- Mr Duncan Finch
- Dr Jane Bickerton
- Mr Stephen Chapman
- Mr Stephen Chapman
- Mr Frank Boait
- Mr Frank Boait
- Ms Candace Gillies-Wright
- Mr Scott Palmer
- Mr William Davy
- Gaby Robertshaw
- Ben Jonson House Group
- Stephen Chapman
- Mrs Sandra Fryer
- Fred Rodgers
- Mr Roy Sully
- Miss Frances Northall

- M H Gadsden
- Christopher Gadsden
- Mrs Helen Clifford
- Mrs Sarah Mann
- Mr Philip Ellaway
- Dr David North
- Ms Dulce Merritt
- Mr Adrian Tanovic
- Dr Martin Farebrother
- Helena Twist
- Dr Harf Zatschler
- Mr Dean Wybrow
- Dr Gina Barnes
- Mr Gary Mclean
- Dr Garth Leder
- Dr Benjamin Mohamed
- Mr Frank Smith
- Ben Jonson House Group
Committee
- Dr Jane Bickerton
- Ben Jonson House Group
Committee
- Stephen Chapman
- Mr Kevin Wallace Rogers
- Mr Alex Castle
- Mr Pankaj Shah
- Mr Douglas Bevans

List of Statutory or Other Consultee Responses

- Air Quality Officer
- Historic England
- Environmental Health Officer
- Health and Safety Executive
- Community Facilities Manager (Public
Conveniences)
- Environmental Resilience Officer
- Thames Water
- Thames Water
- Health and Safety Executive
- Barbican Association

- Barbican and Golden Lane Neighbourhood Forum
- Planning Obligations
- Lead Local Flood Authority
- Lead Local Flood Authority
- Air Quality Officer
- Environmental Health Officer
- The Gardens Trust
- Environmental Health

APPENDIX B: Relevant Policies of the Development Plan

Relevant 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 GG4 Delivering the homes Londoners need

Policy GG5 Growing a good economy

Policy SD4 The Central Activities Zone (CAZ)

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering Good Design

Policy D5 Inclusive design

Policy D7 Accessible housing

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire safety

Policy D14 Noise

Policy H1 Increasing housing supply

Policy H4 Delivering affordable housing

Policy H5 Threshold approach to applications

Policy H16 Large-scale purpose-built shared living

Policy HC1 Heritage conservation and growth

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 7 Reducing waste and supporting the circular economy

Policy SI 13 Sustainable drainage

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6.1 Residential parking
Policy T7 Deliveries, servicing and construction
Policy DF1 Delivery of the Plan and Planning Obligations

Relevant Local Plan Policies

CS1 Offices
DM 1.1 Protection of office accommodation
CS4 Planning Contributions
CS10 Design
DM 10.3 Roof gardens and terraces
DM 10.4 Environmental enhancement
DM 10.7 Daylight and sunlight
CS12 Historic Environment
DM 12.1 Managing change affecting all heritage assets and spaces
DM 12.5 Historic parks and gardens
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
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
DM 17.1 Provision for waste in development schemes
DM 17.2 Designing out construction waste

DM 19.2 Biodiversity and urban greening

CS21 Housing

DM 21.1 Location of new housing

DM 21.2 Loss of housing

DM 21.3 Residential environment

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Barbican and Golden Lane Estates Conservation Area Appraisal (2022);

Protected Views SPD (January 2012)

City of London Biodiversity Action Plan (2021)

Relevant Draft City Plan 2040 Policies

Strategic Policy S1: Healthy and Inclusive City

Policy HL1: Inclusive buildings and spaces

Policy HL2: Air quality

Policy HL3: Noise

Strategic Policy S3: Housing

Policy HS1: Location of New Housing

Policy HS3: Residential environment

Policy HS4: Housing quality standards

Strategic Policy S8: Design

Policy DE1: Sustainable Design

Policy DE2: Design Quality

Policy DE7: Daylight and sunlight

Policy DE8: Lighting

Policy VT1: The impacts of development on transport

Policy VT3: Vehicle Parking

Policy AT2: Active Travel including Cycling

Policy AT3: Cycle Parking

Strategic Policy S13: Protected Views

Policy OS2: Urban Greening

Policy OS3: Biodiversity

Policy OS4: Biodiversity Net Gain

Strategic Policy S15: Climate Resilience and Flood Risk

Policy CR3: Sustainable drainage systems (SuDS)

Strategic Policy S16: Circular Economy and Waste

Strategic Policy S23 Smithfield and The Barbican

SCHEDULE: CONDITIONS

<u>Pre-Commencement Conditions</u>	
1.	<p>Time Limit</p> <p>The development hereby permitted shall be begun before the expiration of three years from the date of this permission.</p> <p>REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990</p>
2.	<p>Construction scheme of protective works</p> <p>There shall be no deconstruction or 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).</p> <p>REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.</p>
3.	<p>SUDS Design</p> <p>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:</p> <p>(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to</p>

	<p>no greater than 7.6 l/s, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 30 m³ ;</p> <p>(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.</p> <p>(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.</p> <p>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.</p>
4.	<p>Rain and Greywater Harvesting Details</p> <p>Prior to the commencement of the development, details of the rainwater harvesting and greywater collection systems that can be included into the detailed design, 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.</p> <p>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.</p>
5.	<p>Site Condition Survey</p> <p>Prior to the commencement of works including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority. Proposed finished floor levels at basement and threshold ground floor (threshold review) levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels unless otherwise agreed in writing by the local planning authority.</p> <p>REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>

6.	<p>Non-Road Mobile Machinery Registration</p> <p>Prior to the commencement of the 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.</p> <p>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 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.</p>
7.	<p>Demolition and Construction Logistics</p> <p>Prior to the commencement of works including demolition, a Demolition and Construction Logistics Plan to manage all freight vehicle movements to and from the site during works related to the development has been submitted to and approved in writing by the Local Planning Authority. The Demolition and 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 Demolition and Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.</p> <p>REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.</p>
8.	<p>Thames Water – No construction within 5m of water main</p> <p>No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to</p>

	<p>subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water, prior to the commencement of works. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.</p> <p>Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.</p>
9.	<p>Details of Lifts</p> <p>Prior to commencement of the new structural core, details of the proposed lifts shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.</p> <p>REASON: To ensure that the development will be accessible for disabled people in accordance with the following policy of the Local Plan: DM10.8. 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.</p>
10.	<p>Circular Economy</p> <p>Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing 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 and of the interventions in order to distinguish the historic from the new fabric. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the life-cycle of the development.</p> <p>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</p>

	draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2040; S16.
11.	<p>Post construction circular economy statement</p> <p>No later than 3 months after completion of the building and prior to the development being occupied, a post-construction 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.</p> <p>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.</p>
12.	<p>Detailed Whole Life-Cycle Carbon Assessment</p> <p>Prior to the commencement of the development, excluding demolition and below-ground works of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions savings for modules A1 – A5 of the development achieve at least the GLA standard benchmark and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Carbon Assessment Guidance, and that modules B – C of the development aim to achieve at least the GLA standard benchmark. 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.</p> <p>REASON: To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2040: DE 1.</p>
13.	<p>Post construction whole life-cycle carbon assessment</p> <p>Once the as-built design has been completed (upon commencement of RIBA Stage 6) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon</p>

	<p>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.</p> <p>REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.</p>
14.	<p>Operational carbon emissions</p> <p>Prior to the commencement of development, excluding demolition, an updated Energy Assessment confirming the detailed design stage opportunities for operational carbon reduction from the building to futureproof the development for low carbon operation, and CIBSE TM54 analysis of regulated and unregulated energy requirements 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 Energy Assessment and the carbon reduction measures contained with the approved Energy Assessment shall remain in place for the lifetime of the development.</p> <p>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. Draft City Plan 2040, DE1. 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.</p>
15.	<p>Energy Network connection</p> <p>The development shall be connected to the local district heating network to supply the heating and cooling needs of the site. Any waste heat generated by the plant in the building will be transferred to the local district heating network where it can be utilised.</p> <p>REASON: To minimise carbon emissions by enabling the site to be connected to a district heating and cooling network in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4; draft City Plan 2040: DE1</p>
16.	<p>Post construction BREEAM</p> <p>A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all</p>

	<p>reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.</p> <p>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, draft City Plan 2040; DE1</p>
17.	<p>Rainwater harvesting</p> <p>Before any construction works hereby permitted are begun details of rainwater harvesting 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.</p> <p>REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18 . City Plan 2040: DE3. 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.</p>
18.	<p>Post construction UGF and BNG</p> <p>Within 6 months of completion details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species, scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2040 policy OS2 City Greening and OS3 Biodiversity.</p>
19.	<p>Green Roof</p> <p>Details of the position and size of the green roof(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation 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.</p> <p>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.</p>
20.	<p>Climate Change Resilience Sustainability Statement</p> <p>Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be</p>

	<p>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.</p> <p>REASON: To comply with Local Plan Policy DM 15.5 for Climate change resilience and adaptation and draft City Plan 2040: S15.</p>
21.	<p>Ecological Management Plan</p> <p>Prior to the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted to the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2040 policy OS3 Biodiversity.</p>
22.	<p>Façade details (embodied carbon)</p> <p>Prior to the commencement of façade construction, details of the façade system confirming the detailed design in relation to reducing the embodied carbon impact and waste across all life-cycle stages that would result from the proposed facade types, materials, construction method and 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.</p> <p>REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the Local Plan policies: CS15, DM15.1, DM15.2 and Draft City Plan 2040 policies DE1 and CE1.</p>
23.	<p>Signage and Wayfinding</p>

	<p>Prior to occupation, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking and any other relevant uses shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.</p>
	<p><u>Prior to completion of shell and core conditions</u></p>
24.	<p><u>SuDS and SuDS Maintenance</u></p> <p>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:</p> <p>(a) A Lifetime Maintenance Plan for the SuDS system to include:</p> <ul style="list-style-type: none"> - A full description of how the system would work, it's aims and objectives and the flow control arrangements; - A Maintenance Inspection Checklist/Log; - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. <p>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.</p>
	<p><u>“Prior to commencement of relevant works” conditions</u></p>
25.	<p><u>Plant Noise details and restriction</u></p> <p>(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 most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the plant is or may be in operation.</p>

	<p>(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.</p> <p>(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.</p> <p>REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3</p>
26.	<p><u>Acoustic report submission</u></p> <p>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 non-residential uses 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.</p> <p>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.</p>
27.	<p><u>Fume extraction details</u></p> <p>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 commercial or communal kitchen use. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class E use takes place.</p> <p>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.</p>
28.	<p><u>Mechanical Plant details</u></p>

	<p>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.</p> <p>REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.</p>
29.	<p><u>Backup / emergency Generator details</u></p> <p>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. Where it is not possible to deploy alternatives, any diesel generators must be the latest Euro standard available. 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.</p> <p>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.</p>
30.	<p><u>Lighting Strategy</u></p> <p>Prior to the commencement of the relevant works, a Lighting Strategy and a Technical Lighting Design for all internal and external lighting shall be submitted to and approved in writing by the Local Planning Authority, which should include details of:</p> <ul style="list-style-type: none"> • 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; <p>- details for impact on the public realm, including typical</p>

	<p>illuminance levels, uniformity, colour appearance and colour rendering.</p> <ul style="list-style-type: none"> • All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy. <p>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 Lighting SPD and the following policies of the Local Plan: DM10.1, 15.7 , CS15, emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036 and the City of London Lighting SPD 2023.</p>
31.	<p><u>Details of street lighting installation</u></p> <p>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.</p> <p>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</p>
32.	<p><u>Detailed Design and Materials</u></p> <p>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:</p> <ol style="list-style-type: none"> a. particulars and samples of the materials to be used on all external faces of the building including details of compliance with the approved Circular Economy Strategy; b. construction of 1:1 sample material and facade panels of agreed sections of the facades; c. detailed drawings of a scale no less than 1:20, in plan, section and elevation of agreed typical bays, including agreed typical bays including reference to materials, finishes, lighting, details of jointing and any necessary expansion/movement joints;

	<ul style="list-style-type: none"> d. details of all new ground and first-floor elevations including all entrances, soffits, columns, integrated art panels, and information boards; e. full details of terraces, including all elevations, entrances, fenestration, planters, seating, lighting, soffits, drainage, and any infrastructure required; f. full details of arched roofs, including all elevations, entrances, fenestration, lighting, soffits, downpipes and any infrastructure required; g. details of walls, railings, balustrades, ramps, gates, screens, handrails etc, bounding or within the site; h. details of the integration of building cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room; i. details of all new service vehicles, fire escape and cycle store entrances; j. details of access to the roof for cleaning and maintenance, including details of mansafe equipment; k. Notwithstanding the approved drawings, full details of the rooftop including any plant equipment, integration of M&E and building services and railings; l. details of the removal, storage and reinstatement within the development of the Murry House mural; <p>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 and emerging policies DE2, DE6 and HE1 of the Draft City Plan 2040.</p>
33.	<p><u>Hard and soft landscaping details</u></p> <p>(A). Before works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local</p>

	<p>Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ol style="list-style-type: none"> a) Details of all soft landscaping, including the position, size and types of all planting and details of their respective planting beds and their contribution to biodiversity and inclusivity; b) Details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights; and details of tree pits/trenches and growing medium; c) Details of provisions for harvesting d) Details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement; e) Details of all urban furniture, including planters; seating; refuse bins; biodiversity habitat; f) Details of all hard landscaping materials, including paving details and samples, in accordance with the City Public Realm Technical Manual; g) Details of landscape lighting h) Details of biodiverse green roofs, i) A management and maintenance Plan (including ecological management) for all proposed landscaping. <p>(B). 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.</p>
34.	<p>Accessible Parking Design and Management Plan</p> <p>One accessible parking space shall be provided on the site. Before any works thereby affected are begun, an Accessible Parking Management Plan setting out the details of the layout and the arrangement of the proposed on-site accessible parking space, 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. This shall include details of:</p> <ul style="list-style-type: none"> • Electric Vehicle Charging Point (EVCP) for the disabled car parking space

	<ul style="list-style-type: none"> • Levels within the car parking area, include visibility splays and vehicle circulatory movements, provide clear and unobstructed headroom. • Details of access to the space, including gate control, and how this would ensure 'No waiting on the public highway'. • Health & Safety audit and risk assessment for the disabled user of the car parking space. • Allocation criteria for the disabled car parking space, • Details of any booking system for the space, keeping records and managing the demand, • Monitoring the use, including non-compliance/ enforcement. • Details of any directional or wayfinding signage required <p>REASON: To ensure the development proposals provides a fully accessible and inclusive facility and the management of the parking is satisfactory and safe, in accordance with Policies DM10.8, DM16.1 and DM16.5 of the Local Plan and Policy D5 and T6 of the London Plan.</p>
35.	<p><u>Accessibility and Inclusivity details</u></p> <p>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:</p> <ol style="list-style-type: none"> a. Details of all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate; b. Details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation, thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20; c. Details of the cycle stand types and setting out of long stay cycle spaces, including swept paths , and end of trip facilities and access routes; d. details of residential reception; e. Details of typical accessible room furniture layouts at a scale no less than 1:20; f. Planting to all communal amenity spaces and balconies including path widths and seating and demonstrating how unwelcome touch and scent can be avoided; <p>REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan</p>
36.	<p><u>Inclusive Access Management Plan</u></p> <p>Prior to the occupation of the development, an Access Management Plan shall be submitted to and approved in writing by the Local</p>

	<p>Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved 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:</p> <p>(1) Website information including photos and an easy read version with information on:</p> <ul style="list-style-type: none"> a) Travel distances in metres from key step-free points of arrival including identified rest points at intervals of no more than 50m b) Location of dropped kerbs c) Facilities available on-site including dimensions and photos for (as appropriate): <ul style="list-style-type: none"> i. entrances and lift access ii. controlled entry points iii. accessible toilets including protocol for access to Radar key if applicable iv. facilities for assistance animals v. assistive listening system and other assistive technology vi. rest and recovery facilities/quiet room vii. room for reflection/prayer room viii. location of accessible communal facilities <p>(2) Inclusive Entrances Strategy: 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.</p> <p>REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.</p>
37.	<p><u>Cycle Parking Management Plan</u></p> <p>Before any works thereby affected are begun, a Cycle Parking Management Plan setting out the details of the layout and the arrangement of the long stay and short stay cycle parking, at no less than shown on the approved drawings unless agreed in writing by the Local Planning Authority, as well as security and access arrangements</p>

	<p>including a wayfinding strategy, shall be submitted to and approved in writing by the Local Planning Authority. The cycle parking arrangements detailed in the approved Cycle Management Plan shall thereafter be maintained in accordance with the approved Plan for the life of the building unless otherwise agreed in writing with the Local Planning Authority. The cycle parking provided on the site must remain ancillary to the use of the building and must be available for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.</p> <p>REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and London Plan Policy T5.</p>
38.	<p>Refuse and Recycling Details</p> <p>Notwithstanding the refuse collection and storage facilities shown on the drawings hereby approved, full details of these facilities, including storage and collection protocol and who is responsible for this, shall be submitted to and approved in writing by the Local Planning Authority, prior to commencement of the relevant works. The approved facilities shall thereafter be provided and maintained in accordance with BS5906 Specifications throughout the life of the building for the use of all the occupiers.</p> <p>REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.</p>
	<p><u>Prior to Occupation Conditions</u></p>
39.	<p><u>Residential noise levels and testing</u></p> <p>(a) All residential premises in the development shall be designed and constructed to attain the following internal noise levels:</p> <ul style="list-style-type: none"> • Bedrooms- 30dB LAeq,T* and 45dB LAmax • Living rooms- 30dB LAeq, T* • *T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00-23:00. <p>(b) 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.</p> <p>REASON: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise</p>

	from environmental and transportation sources in accordance with the Local Plan: DM21.3 and D21.5.
40.	<p><u>Delivery and Servicing</u></p> <p>Details of a Delivery and Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Delivery and Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.</p> <p>REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1.</p>
41.	<p><u>Thames Water Upgrades confirmation</u></p> <p>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.</p> <p>Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.</p>
	<u>Compliance conditions</u>
42.	<p><u>No Audible Music Outside Premises</u></p> <p>No live or recorded music shall be played at such a level that it can be heard outside the premises or within any residential or other premises in the building.</p> <p>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.</p>

43.	<p><u>No Music on External Amenity Areas</u></p> <p>No amplified or other music shall be played on the 9th floor terrace or courtyard amenity space.</p> <p>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.</p>
44.	<p><u>Servicing Hours Restriction (amenity)</u></p> <p>No servicing of the premises shall be carried out between the hours of (i) 23:00 on one day and 07:00 on the following from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays; or (ii) 07:00hrs and 09:00hrs, 12:00hrs and 14:00hrs, 16:00hrs and 19:00hrs, Mondays to Fridays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.</p> <p>REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3</p>
45.	<p><u>External amenity restriction hours</u></p> <p>(a) The roof terrace on level 9 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 on the following day, other than in the case of emergency.</p> <p>(b) Between the hours of 22:00 on one day and 07:00 on the following day, the courtyard external amenity area shall not be used other than for access or emergency purposes, and shall not be used for gathering or socialising.</p> <p>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.</p>
46.	<p><u>Control of Odour & Noise from Commercial Kitchen Extract Systems</u></p> <p>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</p>

	<p>site and upon request provided to the Local Planning Authority to demonstrate compliance.</p> <p>Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3</p>
47.	<p><u>Level Thresholds</u></p> <p>The threshold of the private public realm and public route entrances shall be at the same level as the rear of the adjoining footway.</p> <p>REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.</p>
48.	<p><u>Approved Plans</u></p> <p>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:</p> <p><i>Received 20 August 2024:</i> Proposed Ground Floor Plan: 22107-AHMM-XX-GF-DR-A-PL120 Rev.P05 Proposed South Elevation: 22107-AHMM-XX-XX-DR-A-PL220 Rev.P02</p> <p><i>Received 2 August 2024:</i> Basement Plan Rooms Layout: 10460-IRB-XX-B1-D-M-5001 Rev.P01</p> <p><i>Received 9 July 2024:</i> Proposed West Elevation: 22107-AHMM-XX-XX-DR-A-PL222 Rev.P02</p> <p><i>Received 1 May 2024:</i> Proposed Level 02 Floor Plan: 22107-AHMM-XX-02-DR-A-PL122 Rev.P01 Proposed Roof Plan: 22107-AHMM-XX-RF-DR-A-PL126 Rev.P01 Proposed Level 03-05 Floor Plan: 22107-AHMM-XX-ZZ-DR-A-PL127 Proposed Section AA: 22107-AHMM-XX-XX-DR-A-PL320 Rev.P01 Proposed Section BB: 22107-AHMM-XX-XX-DR-A-PL321 Rev.P01 Proposed Section CC: 22108-AHMM-XX-XX-DR-A-PL322 Proposed Section DD: 22109-AHMM-XX-XX-DR-A-PL323 Proposed Section EE: 22110-AHMM-XX-XX-DR-A-PL324 Proposed East Elevation: 22107-AHMM-XX-XX-DR-A-PL221 Rev.P01 Proposed North Elevation: 22107-AHMM-XX-XX-DR-A-PL223 Rev.P01 Core Plan Layout – typical level: 22170-AHMM-A-SK089 Public Realm Plan: EAS-ZZ-DR-L-002 Courtyard Plan: EAS-ZZ-DR-L-002 Roof Terrace Plan: EAS-ZZ-DR-L-003</p>

	<p>Planting Plan: EAS-ZZ-DR-L-004</p> <p><i>Received 19 February 2024:</i></p> <p>Proposed Site Plan: 22107-AHMM-XX-RF-DR-A-PL003 Rev.P01</p> <p>Site Location Plan: 22107-AHMM-XX-RF-DR-A-PL004</p> <p>Proposed Basement Plan: 22107-AHMM-XX-B1-DR-A-PL092</p> <p>Proposed Level 01 Floor Plan: 22107-AHMM-XX-01-DR-A-PL121</p> <p>Proposed Level 06-07 Floor Plan: 22107-AHMM-XX-01-DR-A-PL123</p> <p>Proposed Level 08 Floor Plan: 22107-AHMM-XX-01-DR-A-PL124</p> <p>Proposed Level 09 Floor Plan: 22107-AHMM-XX-01-DR-A-PL125</p> <p>Bay Study Base: 22107-AHMM-XX-XX-DR-A-PL250</p> <p>Bay Study Top: 22107-AHMM-XX-XX-DR-A-PL251</p> <p>Unit Layout Type 01 and Type 02 M4: 22107-AHMM-XX-ZZ-DR-A-PL400</p> <p>Unit Layout Type 03 M4: 22107-AHMM-XX-ZZ-DR-A-PL401</p> <p>Unit Layout Type 04 and Type 05 M4: 22107-AHMM-XX-ZZ-DR-A-PL402</p> <p>Unit Layout Type 06 M4: 22107-AHMM-XX-ZZ-DR-A-PL403</p> <p>Accessible Unit Type 01 M4: 22107-AHMM-XX-ZZ-DR-A-PL404</p> <p>Accessible Unit Type 02 M4: 22107-AHMM-XX-ZZ-DR-A-PL405</p> <p>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.</p>
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Informatives:

1.	<p>NPPF</p> <p>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:</p> <ul style="list-style-type: none"> • 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.	<p>Consult Environmental Department</p>

	<p>The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:</p> <p>(a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.</p> <p>(b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.</p> <p>(c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).</p> <p>You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.</p> <p>(d) Bridges over highways</p> <p>(e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.</p> <p>(f) Declaration, alteration and discontinuance of City and Riverside Walkways.</p> <p>(g) The provision of City Walkway drainage facilities and maintenance arrangements thereof.</p> <p>(h) Connections to the local sewerage and surface water system.</p> <p>(i) Carriageway crossovers.</p> <p>(j) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".</p>
3.	<p>Roof Gardens</p> <p>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</p>

	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.
4.	<p>Ventilation</p> <p>Ventilation for any kitchens will need to be provided to roof level. Planning permission will be required for any ducts, vents or plant that would materially affect the external appearance of the building. It cannot be assumed that ductwork will be permitted on the exterior of the building.</p>
5.	<p>Crime Prevention</p> <p>The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.</p>
6.	<p>Right to light</p> <p>This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.</p>
7.	<p>Compliance with the Clean Air Act 1993</p> <p>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.</p>
8.	<p>Generators and combustion plant</p> <p>Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)</p>

9.	<p>Highway works</p> <p>Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.</p>
10.	<p>Access and inclusivity</p> <p>Access for disabled people is a material consideration in the determination of planning applications. The City of London's Access Advisor has assessed the planning application to ensure that the proposal meets the highest standards of accessibility and inclusive design required by London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and Draft City Plan 2046 Policy HL1. The Access Advisor promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy.</p> <p>Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.</p>
11.	<p>CIL</p> <p>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:</p> <ul style="list-style-type: none"> • Office 185GBP per sq.m • Retail 165GBP per sq.m • Hotel 140GBP per sq.m • All other uses 80GBP per sq.m <p>These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.</p> <p>The City of London Community Infrastructure Levy is set at a rate of 75GBP per sq.m for offices, 150GBP per sq.m for Riverside Residential, 95GBP per sq.m for Rest of City Residential and 75GBP for all other uses.</p> <p>The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted.</p>

	<p>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.</p> <p>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).</p> <p>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.</p>
12.	<p><i>Thames Water informatives</i></p> <p>Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</p> <p>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</p>

02035779483 or by emailing trade.effluent@thameswater.co.uk .
Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>
Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Please see Thames Water guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>
Should you require further information please contact Thames Water.
[Email:developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)

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From: 
To: 
Cc: 
Subject: 24/00176/FULL - 45 Beech Street
Date: 29 February 2024 13:50:46

Hiya Sam,

Thanks for your time earlier, was good to chat through the generator points. Another point to check is that consultation with the City Corporation is detailed within the air quality assessment; The assessment follows a methodology outlined to The City of London Corporation via the project team's planner in November 2023. Do you know if this was sent over to Kyri or myself in air quality? As there are a few points stated that we probably would have challenged.

In terms of the planning application 24/00176/FULL 45 Beech Street, I've reviewed the Air Quality Assessment and other relevant documents that have been submitted and have a number of comments prior to being able to finalise a decision on the application.

Is it possible to share the following with the applicant. Happy for my contact details to be shared with the air quality consultant if they have any questions or wish to discuss any of the comments. Comments marked (R) require a response, those marked (I) are for information only.

- Operational Phase Impact Assessment:
 - Impacts at Existing Receptors:
 - In paragraph 7.1 of the AQA there is no mention of the 2,920 vehicle proposed vehicle trips detailed in the AQ Neutral assessment. Have these been considered when assessing the impact of the development on local roadside air quality? (R)
 - Impact of Existing Emissions on Proposed Development:
 - The main entrance to the development fronts Beech Street at a location where one side of Beech Street tunnel is open, therefore a location where vehicle emissions contained within Beech Street tunnel can ventilate out to the wider atmosphere. The reference to Defra, 2022 regarding the fall off of NO₂ concentrations from source cannot be stated with certainty at this location. There are a high number of limitations associated with the Defra methodology, and associated tool, as it has not been developed with a one-sided tunnel break in mind. We would require further justification that the proposed development, especially the façade fronting Beech Street is suitable for residential occupancy. (R)
 - What is the lowest level where openable vent panels are located? It would appear from page 77 on the Design and Access Statement these are to be from the first floor upwards. Similar to the point above, we would require further justification that the proposed development, especially the façade fronting Beech Street is suitable for ambient venting. (R)
 - It is stated within the planning documents that ventilation is to be provided through MVHR, please can it be confirmed where all air inlets for the MVHR are proposed to be located and the predicted pollutant concentrations at these locations. (R)
- Assessment of Proposed Emergency Generator:

As detailed in the pre-planning AQ checklist, [Planning and air quality - City of London](#), alternatives to diesel generators designed to be used in an emergency should be investigated at the design stage. Has an assessment been completed to identify possibly alternatives? (R)

- The flue for the proposed generator is at a height of 2.5m and the location is enclosed on all four sides by Bryer Court, Bridgewater House and the development, with building heights far greater than that of the flue, 20-34m approx. As detailed in the pre-planning AQ checklist, [Planning and air quality - City of London](#), generator flues should terminate above the tallest part of the development. This is stated in the AQA as point 8 of para 2.42 on page 15. (R)
- It is stated that the proposed generator will conform to Stage V emissions standard. The technical specification for the model of generator provided, [PTVS-D-385ST](#), states compliance with Stage II and not Stage V. If this generator does in fact conform to Stage V please provide appropriate evidence. (R)

Kind regards,

Paul



Paul Bentley

Air Quality Officer

City of London | Environment Department | Guildhall | London | EC2V 7HH



www.cityoflondon.gov.uk

Bob Roberts

Interim Executive Director Environment

Upcoming absences:

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Download the [CityAir App](#) for current information on air pollution in the City.



Mr Samuel James
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3764

Our ref: P01573402

29 February 2024

Dear Mr James

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**45 BEECH STREET LONDON EC2Y 8AD
Application No. 24/00176/FULL**

Thank you for your letter of 27 February 2024 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
[HistoricEngland.org.uk](https://www.historicengland.org.uk)





Historic England

Charlotte Cartwright

Business Officer

E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Memo



To Assistant Director (Development Management)
Department of the Built Environment
Email: [REDACTED]

From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone [REDACTED]
Email [REDACTED]

Date 01 March 2024
Our Ref 24/01341/NPLN
Your Ref 24/00176/FULL

Subject 45 Beech Street London EC2Y 8AD

Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Thank you for your memorandum. I have reviewed the application and I recommend that the following conditions be attached to any consent:

No live or recorded music shall be played at such a level that it can be heard outside the premises or within any residential or other premises in the building.

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.

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

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

(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 most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the 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.

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

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

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.

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 non-residential uses 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.

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 commercial or communal kitchen 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.

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.

Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to

air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.

REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

The roof terraces on level 9 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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

No amplified or other music shall be played on the 9th floor terrace or other external amenity space.

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.

Regards



Donal Rooney

Environmental Health Officer
Pollution Team

Dept. of Markets & Consumer Protection
City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Mob: 

Begum, Shupi

From: PlanningGatewayOne [REDACTED]
Sent: 05 March 2024 07:49
To: PLN - Comments
Subject: RE: Planning Application Consultation: 24/00176/FULL (Our Ref pgo-4899)

THIS IS AN EXTERNAL EMAIL

Good Afternoon,

Thank you for consulting HSE for this application.

Unfortunately, due to the lack of a fire statement, we are unable to carry out an assessment for this application.

Regarding the above planning application, the associated documents have been reviewed and I can confirm that the application does not include a fire statement form.

We note that the application includes a document described as a fire strategy, which has been prepared to satisfy London Plan policy requirements.

From 1 August 2021, any application for planning permission for development that includes a relevant building is required to include a fire statement. The legislation requires that a fire statement must be submitted on a form published by the Secretary of State, or a form substantially to the same effect, and include the particulars specified or referred to in the form. This requirement is separate to demonstrating compliance with London Plan policy.

We aim to respond to enquiries within 21 calendar days from receipt of the fire statement.

The fire statement form and guidance on the completion of a fire statement, published by the Secretary of State, are available on https://www.gov.uk/government/publications/planning-application-forms-templates-for-local-planning-authorities#attachment_5407285

Further HSE guidance on planning gateway one can be found here:
<https://www.hse.gov.uk/landuseplanning/fire-safety.htm>

Therefore, a completed fire statement, as described above, is needed to carry out an assessment of this application.

Kind Regards

Suki Sanghera



Sukhvinder Sanghera (Mrs)
Operational Support | Planning Gateway One | Building Safety Regulator

-----Original Message-----

From: PLNComments@cityoflondon.gov.uk

Sent: Monday, March 4, 2024 4:16 PM

To: PlanningGatewayOne

Subject: Planning Application Consultation: 24/00176/FULL

Dear Sir/Madam

Please see attached consultation for 45 Beech Street London EC2Y 8AD .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Samuel James
Environment Department
City of London

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Begum, Shupi

From: James, Samuel
Sent: 06 March 2024 11:21
To: PLN - Comments
Subject: Fw: 24/00176/FULL - 45 Beech Street

From: Varma, Vimal [REDACTED]
Sent: 06 March 2024 10:32
To: James, Samuel [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: 24/00176/FULL - 45 Beech Street

Hi Sam,

The waste storage and collection facilities indicated on Drawings No. 22170 AHMM XX GF DR A PL120 Rev P00 and 22170 AHMM XX B1 DR A PL092 Rev P00 comply with our requirements. This Division will, therefore, raise no objections to this application.

Please note,

- 1 Bin store need to comply with BS5906 specifications.
2. FB2 or Budget lock to be put on ground floor waste store to allow collection crew access from the highway.

Thanks

Vimal

-----Original Message-----

From: [REDACTED]
Sent: Tuesday, February 27, 2024 11:39 AM
To: Varma, Vimal [REDACTED] Turner, Lee [REDACTED]
Subject: Planning Application Consultation: 24/00176/FULL

Dear Sir/Madam

Please see attached consultation for 45 Beech Street London EC2Y 8AD .
Reply with your comments to [HYPERLINK \[REDACTED\]](#)
[REDACTED]

Kind Regards

Planning Administration

On behalf of

Samuel James
Environment Department
City of London

Begum, Shupi

From: Brown, Ella
Sent: 07 March 2024 15:25
To: James, Samuel; PLN - Comments
Cc: McCallum, Kieran
Subject: SUDS24/0016 - 45 Beech Street

Hi Sam / Keiran,

I've just been reviewing the drainage information submitted for 45 Beech Street (24/00176/FULL). Currently, the drainage strategy is not sufficient to allow us to recommend our standard conditions. Please could you forward on our comment below to the applicant so they can amend the report and we can re-review the information.

The Drainage Strategy prepared by Whitby Wood (Feb 2024) does not contain a sufficient amount of evidence to demonstrate that the applicant has considered all attenuation options to restrict the surface water discharge rate to greenfield rates, or as close to greenfield rates as possible.

Whilst we recognise that the nature of this application does constrain the options for SUDs, we would expect a 50% betterment on the existing rates to be a last resort. Therefore, the applicant should demonstrate an assessment of all the preferred options and their associated attenuation amounts (e.g. greenfield rate, <5 l/s) with clear justifications as to why these or not achievable before proposing a 50% betterment.

Many thanks,

 **Ella Brown** (she/her)
Environmental Resilience Officer
City of London | Environment Department | Planning & Development Division
Guildhall | London | EC2V 7HH
[REDACTED] | www.cityoflondon.gov.uk



Corporation of London Department of Planning & Transportation PO Our DTS Ref: 76232 Your Ref:
Box 270 Guildhall London EC2P 2EJ 24/00176/FULL
21 March 2024

Dear Sir/Madam

Re: 45, Beech Street, Barbican, London , EC2Y 8AD

Waste Comments

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

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional 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 - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development” The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://www.thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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

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

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility

infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Yours faithfully

Development Planning Department

Advice to the local planning authority

Advice to the local planning authority (LPA) from the Health and Safety Executive (HSE) as a statutory consultee for developments that include a relevant building.

To LPA	City of London
LPA planning ref no	24/00176/FULL
Our ref	pgo-4928
Site address	45 Beech Street London EC2Y 8AD
Proposal description	Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.
Date on fire statement	19/01/2024
Date consultation received	08/03/2024
Date response sent	25/03/2024

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Headline response from HSE
Headline Response from HSE ('content')

Scope of consultation

- 1.1. The above consultation relates to the partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces.
- 1.2. 45 Beech Street is a 10-storey (plus basement) residential building with a height of 30.92m.

- 1.3. The development comprises a change of use from an existing office building to residential use. New structure is to be provided above the existing level 05 floor slab.
- 1.4. The proposed development is split across 11 floors (basement, ground floor and Levels 01 to level 09) and is provided with a firefighting stair (Stair A) and an escape stair (Stair B). The firefighting stair serves all levels and the escape stair serves all levels, except the basement.
- 1.5. The fire statement dated 19/01/2024, states the adopted fire safety design standard is BS 9991. HSE has assessed this application on that basis.

Consultation

- 1.6. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified some matters as supplementary information, set out below, that the applicant should try to address, in advance of later regulatory stages.

2. Supplementary information

The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority.

Means of escape / fire/smoke curtains

- 2.1. Section 8 (6) of the fire statement states: *"Stair A discharges out to Beech Street on the ground level via a protected corridor, which also acts as the firefighting access corridor. The corridor is not lobby protected from the adjacent accommodation (reception desk, café/lounge, and co-working lounge); however, **fire/smoke curtains are to be provided** across all doors/openings to ensure the discharge route is protected in the event of a fire in the adjoining areas. The fire curtains over circulation routes are used in conjunction with physical fire doors, in order to provide additional resilience and protection against fire and smoke spread."*
- 2.2. The same section additionally states: *"Stair B discharges out to Bridgewater Street on the ground level via a protected corridor. The discharge route is separated from the café/lounge by a protected lobby and **separated from the shared kitchen by a set of fire doors and fire/smoke curtain** (in lieu of a protected lobby).
*Note: The fire curtains used on the ground level will not adversely impact means of escape provisions from the rooms – in the event of all fire curtains activating, all occupants are provided with escape routes which satisfy the relevant travel distance requirements."**
- 2.3. It should be noted that British Standard 7974 advocates that building design should firstly seek to eliminate fire safety hazards using construction and layout, rather than relying on active systems, building management processes and systems maintenance.
- 2.4. Where alternative fire engineered design solutions are justified, a qualitative design review (QDR) should be undertaken. This should include the assessment of 'what if'

events to identify foreseeable events that might have a significant influence on the outcome of the study. This may include fire safety system failures, management failures and/or workmanship failures.

- 2.5. Accordingly, it will be for the applicant to demonstrate that the proposed protection of the stairs by active systems and management procedures affords sufficient margins of safety. In this instance, however, should the QDR show that a sufficient level of safety has not been achieved by the installation of a fire and smoke curtain, the provision of an internal dividing wall, to overcome this issue, is unlikely to affect land use planning considerations.
- 2.6. The above is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Mechanical smoke ventilation

- 2.7. Section 8 (4) of the fire statement states: *“Levels 01-09, northern section of corridor: co-living rooms open into mechanically ventilated dead-end section of corridor. Maximum **single travel distance of 24.0m from furthest co-living room to Stair B** naturally ventilated lift lobby.*

The northern section of extended corridor is to be provided with a mechanical smoke shaft (extract) at the remote end of the corridor, with inlet air provided by the mechanical smoke shaft (inlet) in the corridor adjacent to the lift lobby and the AOV at the head of the stair. In this arrangement, the mechanical ventilation system is to be designed to protect the stair from smoke ingress and ensure that tenable conditions can be achieved within the full extent of the lift lobby and common corridor. Where mechanical ventilation is to be used, the performance of the systems is to be demonstrated by Computational Fluid Dynamics (CFD) modelling at a later design stage.”

- 2.8. This is noted. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Fire service access and facilities

- 2.9. It is noted that Stair B is provided for means of escape with **Stair A as the firefighting stair**. The travel distance from the firefighting stair to the furthest flat entrance door appears to be circa 35m.

- 2.10. The cited fire safety standard, BS9991, refers in annex A.1 to the Smoke Control Association publication *‘Guidance on smoke control to common escape routes in apartment buildings’*. This states in relation to smoke control and firefighter safety: *‘...designers should be aware that single direction travel distances over 30m in length (measured from the staircase door to the furthest flat entrance door) in common escape routes are considered to present onerous conditions for fire fighters even if the flats are fitted with suppression systems’*.

- 2.11. This publication also contains a Forward from the National Fire Chiefs’ Council which states: *‘Whilst 30m might seem like an arbitrary figure to some, firefighting from long corridors can present exceptionally onerous conditions for firefighters.’*

- 2.12. Similarly, the British Standard relating to fire service intervention (PD7974-5) states: *'Irrespective of the corridor smoke control solution, FSE design should take into account the limitations necessarily imposed by firefighter physiology. Therefore, single direction travel distances within common corridors should not exceed 30 m between the furthest flat entrance door and the stairwell door'*.
- 2.13. Whilst it is noted that an additional means of escape staircase is provided, firefighting operations are launched from a 'bridgehead' within a firefighting shaft. Firefighters will, therefore, travel from a firefighting staircase to the remote flats to extinguish fires or rescue casualties. Floor plan drawings show flats which are in excess of 30m from the firefighting staircase.
- 2.14. This situation might be improved if stair B was the firefighting stair and thus reduce firefighter travel distance from the firefighting stair. In this instance it is noted that space has already been allocated for the firefighting shaft (Stair A) and the means of escape stair (Stair B) and this matter can be resolved without affecting land use planning considerations by way of, for example, reconfiguration of the firefighting shaft to include the relocation of the firefighting stair to reduce the travel distance for firefighters. However, any internal alterations will be for the design team to decide and it will be for the applicant to demonstrate compliance at later regulatory stages.

Sprinklers

- 2.15. Section 8 (7) of the first statement states: *"The basement level has an area exceeding 200m²; therefore, it is required to be provided with a smoke clearance system. It is proposed to achieve this via mechanical ventilation... Additionally, there are four doors from the basement which open directly to the outside, as well as a window from the gym.*

In accordance with BS 9991:2015, where a mechanical smoke ventilation system is provided, the sprinkler system should be in accordance with BS EN 12845. However, it is considered acceptable to use a Category 4 system in accordance with BS 9251:2021, using the enhancements outlined in BS 9251:2021 for non-residential accommodation based on the following:

A BS 9251:2021 Category 4 system did not exist at the time of BS 9991:2015. A BS 9251:2021 Category 4 system, used for non-residential and ordinary hazard areas, includes enhancements such as extended water supply, increased area of operation, enhanced design density, increased number of sprinkler heads, secondary power supply, etc. – all requirements which were not included in BS 9251:2014 (which was the residential sprinkler standard at the time of BS 9991:2015 and only applied to residential areas)

A Category 4 system in accordance with BS 9251:2021, for non-residential areas, is considered equivalent to a Category OH1 system in accordance with BS EN 12845, up to a maximum compartment size of 100m² (all compartments are less than 100m²)."

- 2.16. This is noted. It will be for the applicant to demonstrate compliance at later regulatory stages.

Hydrants

2.17. The response to the question about the reliance on the use of existing hydrants and whether they are currently usable / operable (fire statement, section 13) is given as “don’t know”. Whilst the response “don’t know” is a valid response on the form, it is not appropriate to this development, which relies on working fire hydrants to feed the proposed fire main. In circumstances such as this, best practice is to check the state of the existing hydrants with the water authority. Without knowing their operability, the proposal might be relying on a disused water main or faulty hydrant.

2.18. It will be for the applicant to demonstrate compliance at later regulatory stages.

Green roofs

2.19. Paragraph 5.11 of the London Plan fire statement states: *“A green roof is to be provided at level 01 and level 10 (roof level) of the building. The green roof installation is to follow the recommendations outlined within the Green Roof Organisation (GRO) Green Roof Code (2021, inc. June 2023 amendments)...”*

2.20. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Yours sincerely


Stephen Gallagher
Fire Safety Information Assessor

Guidance on Planning Gateway One is available on the Planning Portal: [Planning and fire safety - Planning Portal](#).

This response does not provide advice on any of the following:

matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application

matters related to planning applications around major hazard sites, licensed explosive sites and pipelines

applications for hazardous substances consent

London Plan policy compliance



Representing the interests of Barbican Residents

BA Planning Sub-Committee
c/o 343 Lauderdale Tower
Barbican
London EC2Y 8NA

The City Planning Officer
Department of the Built Environment
City of London
PO Box 270,
Guildhall
London EC2P 2EJ

26 March 2024

For the attention of Mr Samuel James, Senior Planning Officer

Comments re application: 24/00176/FULL; 45 Beech Street

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Dear Mr James,

We are writing on behalf of the Barbican Association, a Recognised Tenants 'Association representing residents of the Barbican Estate, to make the following observations on the above application. Whilst we support the addition of much needed housing in the City, we do have concerns over a number of issues with this application with regard to loss of residential amenity and would request that apposite changes and conditions be attached to any planning consent.

Loss of residential amenity

Roof terraces and balconies

Although not yet formally adopted, we believe that the policies in the emerging Draft City Plan 2040 should now carry considerable weight when assessing planning applications. This is partly because it has been so long in production and the policies on residential protection have been there (unchallenged) since the first iteration but primarily because it has already been formally approved by the Court of Common Council (at its meeting of 8th March 2024). This milestone was reached following the Plan's successful journey through the Planning & Transportation and the Policy & Resource Committees earlier this year.

We would therefore point out that in Policy DE5 of the emerging Draft City Plan 2040: Terraces and Viewing Galleries it states that roof terraces will be encouraged where “***there would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity. Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be considered as an alternative...***”

Bearing this in mind, it is thus disappointing to note that the applicant describes the location of the proposed external roof terrace as ‘*To the north, the volume steps back to meet Bridgewater House, creating an opportunity for an external amenity terrace. This terrace aims to cultivate a relaxed outdoor environment, promoting health and wellness for all users....*’

This external amenity terrace may well create ‘*a relaxed outdoor environment, promoting health and wellness for all users...*’ but it will also create a space directly overlooking nearby residential premises, Bridgewater House in particular. In terms of the proposed balconies – including the one on level 08 as well as the extended one on level 09 - we would also observe that Shakespeare Tower, Ben Jonson House, the Cobalt Building and Bridgewater House will all be overlooked, resulting in a further loss of privacy.

Overlooking/Loss of daylight and sunlight.

Once again in the emerging Draft City Plan 2040, it states in Policy HS3: Residential Environment that: “***All development proposals should be designed to minimise overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation. Light spill from development that could affect residential areas should be minimised, in line with policy DE9.....***”

The application states that it ‘*proposes to retain and refurbish the majority of the existing building..*’. Whilst ‘*the top two floors are not suitable for retention given the low floor to ceiling heights and general incompatibility for the proposed use. They are proposed to be removed and replaced with four new floors of new built form....The existing building (which peaks at 8 storeys and 42.36m AOD) will have a net increase in height of two floors – with a final finished maximum height of 50m AOD...*’

This is an increase in height of 7.64m – or 18% compared to the existing building.....

The Planning and Design & Access Statements also state that ‘*It is proposed to demolish 957.1sqm (GIA) and add a total of 2,641.2sqm (GIA) of new floorspace. This would equate to a 1,684.2sqm increase in floorspace and result in a final building comprising 6,968.2sqm (GIA) of co-living floorspace...*’

....and represents a 32% increase in floorspace.

Whilst we fully appreciate that the applicant would want to maximise the space available, the proposed increases in height and mass does seem somewhat excessive and evoke concerns over such issues as overlooking and loss of daylight and sunlight. The submitted Daylight and Sunlight analyses make reference to these concerns but provide no solutions, particularly to residents in Bridgewater Square. Whilst it is stated that ‘*where windows and rooms have been identified to fall short of the guidelines, these are mainly isolated to the neighbouring*

property at 6-9 Bridgwater Square which contains windows and rooms on its south elevation which face directly into the courtyard and therefore onto the development site”.....this provides scant consolation to the residents affected.

As for the proposal’s impact on the Barbican Estate, it states that ‘consideration has been given to the proximity of the South facade to the edge of the Barbican podium, especially in relation to privacy and overlooking risks to the south facing first floor rooms. The internal layout of these rooms differs from the typical room layout to allow kitchen and living area located closer to the facade and bed/rest area of a more discreet nature, further pushed in the room to increase privacy and avoiding a direct overlooking.....’

This would appear to confirm that residential amenity will be lost by the proposed increase in height and mass given that the consequent loss of both daylight and sunlight will affect not only Bridgewater House but also Bryer Court, Breton House, Ben Jonson House, Tudor Rose Court and Clarendon Court. These blocks, together with Shakespeare Tower, will also be overlooked resulting in loss of privacy and further diminution of residential amenity.

Proposed use of terrace

We would also point out that Policy CV5 of the emerging Draft City Plan 2040: Evening and Night-Time Economy states that “***Proposals for new evening and night-time entertainment and related uses and the extension of existing premises will be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:***

- ***the amenity of residents and other noise-sensitive uses;***
- ***environmental amenity, taking account of the potential for noise, disturbance, waste and odours arising from the operation of the premises, customers arriving at and leaving the premises, and the servicing of the premises... ”.***

Bearing this policy in mind, we were therefore again disappointed to note the proposed scale and use of the external spaces in this application. Indeed, in both the Design & Access and Sustainable Design & Construction Statements the proposed communal outdoor terrace is described as follows:

‘A communal terrace is carefully incorporated to offer elevated social spaces. The design includes stepped seating arrangements that create a theatrelike atmosphere, providing an ideal setting for various activities such as film screenings or events with the use of a screen or projector. The expansive space allows for versatile seating arrangements, enabling the easy movement of tables and chairs to adapt to different needs....’

The prospect of ‘film screenings’ and ‘events’ held on an expansive communal terrace in such a densely populated residential area is likely to create significant noise pollution. This is not only unacceptable but is also in clear contravention of the policies within the Draft City Plan 2040 and will cause significant harm to residential amenity.

Should this application be consented, we would therefore request that restrictions on the timing and uses of the communal external spaces be applied in in order to protect the amenity of the many residential premises in the near vicinity.

Summary

In summary, whilst we support the change of use from office to residential in theory, in practice we have concerns over both the increased height and mass of the proposals and the prospective use of the communal external spaces given their significant impact on residential amenity in a Grade II and Grade II* listed environment located in an important and historic Conservation Area.

For all of the reasons discussed in this letter, we put forward our concerns regarding this application in its current form. We therefore request both a reduction in the proposed development's height and mass and the application of conditions regarding the timing and use of the external communal spaces in order to protect residential amenity.

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-Committee

Sue Cox – Deputy Chair, Barbican Association Planning Sub-Committee

London 02 April 2024

Barbican and Golden Neighbourhood Forum

Dear Samuel James,

Reference: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing, and all other associated works.

While we support the principle of the conversion of the office block to a co-living scheme, we have the following concerns regarding aspects of the proposed development and the information submitted in support of the scheme.

We therefore **OBJEC T** to the application on the following grounds:

The loss of day and sunlight due to too much height at the northern end of the redevelopment.

The size/scale of the barrel vault roofs which are disproportionate and over-dominant in the context of the Barbican's listed status.

The lack of external amenity and the potential for excessive noise pollution from the roof terrace.

Occupancy and minimum term.

Occupancy

At a meeting of the developer with Barbican residents on 15th September 2023, the team stated that the upper floors would feature 174 individual studio apartments with an average size of 23-24m² per unit (smallest 21m², largest 32m²), single occupancy, no pets allowed. Behind the reception the ground floor and the full basement would offer shared spaces for residents (approximately 4-5m²/person): communal cooking facilities, dining area, living area, and co-workspace.

*The London Plan sets out in Chapter 4 Housing, under 4.16.1 "Large-scale shared living developments may provide a housing option for **single person households** who cannot or choose not to live in self-contained homes or HMOs. This policy is required to ensure that new purpose-built shared living developments are of acceptable quality, well-managed and integrated into their surroundings."*

Although the Planning Statement submitted with the application mentions the London Plan Policy H16, the single occupancy (and no pet rule) has been omitted from the application's Draft Co-Living Operational Management Plan. The amount of communal space is calculated on 174 of single occupants and rooms are laid out for one resident per studio.

In our view, single occupancy in compliance with the London Plan should be secured by way of condition.

Minimum Term

At the pre-applications discussions the developer stated that the average stay would be approximately 1 year and agreed that the lease will prohibit short lets, sub-lets and Airbnb.

The London Plan sets out:

*In Policy H16 for 'Large-scale purpose-built shared living' requires under " 5) its units are all for rent with minimum tenancy lengths of **no less than three months**; 6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least: convenient access to a communal kitchen, outside communal amenity space (roof terrace and/or garden) (..)"*

*Under point 4.16.3 "(..) **Tenancies** should be for a minimum of three months to ensure large-scale purpose-built shared living developments do not effectively operate as a hostel."*

Under point 4.16.4 "(..) The agreed management plan should be secured through a Section 106 agreement (..)"

However, the submitted Draft Management Plan states under 4.2 4.3 "(..) All residents will be on tenancy agreements with a minimum term of 1 month, most agreements will typically be on a 12 month term."

The minimum term of 1 month is contrary to the London Plan, which requires a minimum term of 3: 1) To ensure that the proposed development will make a meaningful contributing to meeting London's and the City's housing targets and; 2) to prevent the scheme from operating as a hostel.

Compliance with the plan's minimum term of 3 months, as stated in the Planning Statement, should be included in the Management Plan and secured through the section 106 agreement.

External Amenity Space

The Planning Statement writes under 6.32 "External amenity space is proposed in the form of a roof terrace and courtyard measuring providing a total of 200sqm of space. This equates to 1.1sqm of space per resident and sufficiently balances the wider operational requirements of the building with the need to minimise demolition within this built-up context."

It is considered that the scheme does not provide sufficient external amenity for 174 residents and their guests. 1) The ramp, which slopes from ground to lower ground floor level will be used for servicing the co-living block and, exacerbated by the lack of light and sunlight of the 9-storey deep courtyard, will not offer quality external amenity space. 2) The amount and size of the external amenity spaces are neither noted on plans nor quoted in the Design and Access or Planning Statements. With approximately

50m², which equates to less than 03.m² per resident, the roof terrace will not be sufficient, leading to intensive usage which will also raise the risk of noise and light pollution for neighbours.

As only quality external amenity space the intensive use will have adverse effect on all surrounding flats of Ben Jonson House, Bryer Court, Cobalt Building, Bridgewater House. It appears from the submitted application documents that there would be an unacceptable impact of 9th floor roof terrace, due to noise pollution and direct overlooking, specifically of Ben Jonson House and Bridgewater House.

We would request that an adequate amount and quality of external amenity is provided within the scheme, based on full occupancy of the 174-bedroom co-living scheme. Instead of one large roof terrace, it may be more successful to offer a number of smaller terraces that fit in with the general character of the residential area.

Due to the sensitive location of the external amenity at roof level, in immediate adjacency to residential Ben Jonson House, Bryer Court, Cobalt Building, Bridgewater House, we further request that by way of condition the number of people using the terrace at any one time shall be limited. The hours of use should be restricted as to prevent the disturbance of the residential peace, and a suitable management plan to ensure compliance should be secured by conditions.

Day and sunlight

Along the east elevation the building height will increase from 39.7m AOD to 50.0m and approximately 48.0m for the last two barrel-vaults. The increase in height will have a significant impact on the day and sunlight received by residential properties in Bridgewater House. For the western end of Ben Jonson House, this increase of height will lead to the loss of late afternoon sunlight to north facing dining and bedrooms.

Scale and grain

The architects have employed the barrel-vaulted roof motif of the Barbican Estate. Irrespective of the argument whether this may be appropriate, the borrowed barrel-vaults should be subservient and no larger than the precedent, especially as the proposed development sits proud of the prevailing building line of Ben Jonson House and Bryer Court.

The proposed south elevation features four consecutive segmented arches, each spanning more than 5 metres. The resultant roofscape appears overly dominant, disproportionate, and out of character in comparison to the adjacent barrel-vaulted roofs of Ben Jonson House, which span the distance of only 3.3 metres. The *South Elevation – Proposed*, as shown on Drawing PL-220, should be redesigned so that the proposed building remains subservient and in keeping with the scale and grain of its immediate neighbours, Bryer Court and Ben Jonson House, to protect the setting of these buildings and the Barbican and the Golden Lane Conservation Area from harm.

END OF OBJECTION

Planning Obligations Comments (City CIL, Mayoral CIL and S106)

Address: 45 Beech Street London EC2Y 8AD

Application Reference: 24/00176/FULL

Case Officer: Samuel James

Description: Extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (*sui generis*) including cycle storage, landscaping, servicing and all other associated works.

CIL and Planning Obligations

1. 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.
2. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
3. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. 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).
4. 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	£134,736.00	£129,346.56	£5,389.44

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	£126,315.00	£119,999.25	£6,315.75
City Planning Obligations			
Affordable Housing	TBC	TBC	TBC

Local, Training, Skills and Job Brokerage	£50,526.00	£50,021.00	£505.00
Carbon Reduction Shortfall <i>(as designed)</i> <i>Not indexed</i>	£125,918.00	£125,918.00	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	TBC	TBC	TBC
S106 Monitoring Charge	£4,347.00	£0	£4,347.00
Total liability in accordance with the City of London's policies	TBC	TBC	TBC

City's Planning Obligations

5. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. 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

(Highways Schedule of Condition Survey, site access, consents, licences etc)

- Local Procurement Strategy
- Local Training Skills and Job Brokerage Strategy (*Construction*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Travel Plan (*including Cycling Promotion Plan*)
- Construction Monitoring Cost (*£30,935 for first Year of development and £25,760 for subsequent years*)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Section 278 Agreement (*CoL*)
- Public Realm Space (*Public Access & Management Plan*)
- Co-Living (*Management Plan*)
- Viability Review

6. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.
7. The scope of the s278 agreement may include, but is not limited to (TBC)

Monitoring and Administrative Costs

8. 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.
9. 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.



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Telephone

Email

Date 11th April 2024

Our Ref DS/SUDS24/0016

Your Ref PT_SJ/24/00176/FULL

Subject 45 Beech Street London EC2Y 8AD

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has undertaken a review of the information provided in the above application and does not consider the proposed scheme to satisfy the requirements of the local planning policy in regard to flooding and sustainable drainage, the LLFA therefore recommends that the application be rejected. This is for the following reasons:

- The proposed scheme does not sufficiently control the surface water discharge rate in line with the London Plan and its supplementary planning guidance.
- The proposed scheme has not sufficiently demonstrated that the London Plan Drainage Hierarchy was followed during the design in line with the local plan.

Whilst we recognise that the nature of this application does constrain options for SUDs, we would expect a 50% betterment on the existing rates to be a last resort. Therefore, the applicant should demonstrate an assessment of all the preferred options and their associated attenuation amounts (e.g. greenfield rate, <5 l/s) with clear justifications as to why these or not achievable before proposing a 50% betterment.

If you are aware of any aspect of the proposal that I may have missed that you would like me to have a look at please feel free to contact me.



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Te le p h o n e [REDACTED]

Email [REDACTED]

Date 30th May 2024

Our Ref DS/SUDS24/0016

Your Ref PT_SJ24/00176/FULL

Subject 45 Beech Street London EC2Y 8AD

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the information provided for the above application and would recommend the following conditions should the application be approved:

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 7.6 l/s, provision should be made for an attenuation volume capable of achieving this, which should be no less than 30 m³;
- (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;

- 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.

Memo

To Assistant Director (Development Management)
Environment Department

Email [REDACTED]

From Paul Bentley
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date: 14/08/24

Your Ref: 24/00176/FULL



Subject: 45 Beech Street, London, EC2Y 8AD

Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

The proposed development will be car free as defined within Air Quality Neutral guidance, and the development is to be connected to the CitiGen district heat network which reduces the need for on-site combustion plant. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment. Plans have been submitted showing the location of the generator flue (PL222), this is 1m above the roof level and not located close to any air intakes.

Should the development be approved please attach the following conditions:

Condition M28C amended

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. Where it is not possible to deploy alternatives, any diesel generators must be the latest Euro standard available. 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.

Condition M32 NRMM

Prior to the commencement of the 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 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Roof gardens

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.

Generators and combustion plant

Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: [Medium combustion plant and specified generators: environmental permits - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: [REDACTED]



From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone [REDACTED]
Email [REDACTED]

Date 21 August 2024
Our Ref 24/01341/NPLN
Your Ref 24/00176/FULL

Subject 45 Beech Street London EC2Y 8AD

Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Thank you for your memorandum. I have reviewed the application and I recommend that the following conditions be attached to any consent :

No live or recorded music shall be played at such a level that it can be heard outside the premises or within any residential or other premises in the building.

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.

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

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

City of London PO Box 270, Guildhall, London EC2P 2EJ
Switchboard 020 7606 3030
www.cityoflondon.gov.uk

(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 most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the 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.

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

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

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.

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 non-residential uses 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.

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 commercial or communal kitchen 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.

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.

Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to

air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.

REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

The roof terraces on level 9 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 08:00 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.

No amplified or other music shall be played on the 9th floor terrace or other external amenity space.

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.

Prior to the commencement of the relevant works, a 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.

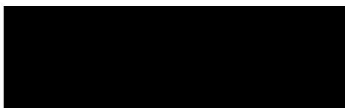
- All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.

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 Lighting SPD and the following policies of the Local Plan: DM10.1, 15.7 , CS15, emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036 and the City of London Lighting SPD 2023.

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: DMI0.1

Regards



Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Mob: 



70 Cowcross Street
London EC1M 6EJ

Telephone: [REDACTED]

Email: [REDACTED]

www.thegardenstrust.org

Emailed to Samuel James

[REDACTED]
City of London Corporation

22nd August 2024

Dear Mr James,

Re: 24/00176/FULL | Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Thank you for consulting the Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks and Gardens of Special Historic Interest in England, as per the above application.

We are grateful for the opportunity to comment on this application, which has a material impact on the significance of The Barbican, an historic designed landscape comprising public, communal and domestic gardens and open spaces, laid out 1962-82, forming an integral part of a housing estate designed by Chamberlin Powell and Bon, with Ove Arup and Partners, Registered by Historic England at Grade II*. The inclusion of this site on this statutory register requires great weight to be given to its conservation.

We write to advise you that we have some concerns about the effect of the height and massing of the proposed development on the significance of The Barbican RPG.

The existing building at 45 Beech Street is considerably lower than, and out of kilter with, the surrounding buildings, so we appreciate that the proposed development, being sympathetic in architecture, massing and style to those buildings next to it, might be an improvement to the setting of the RPG in this area. We are concerned, however, about the proposed height. In order to conserve the significance of the RPG and its setting, new buildings adjacent to the RPG must be lower than the existing, Listed buildings that contribute to the RPG's significance. The existing buildings also have a strong horizontality which the new one lacks, even if it does incorporate the arched details seen across the site. An overly tall building will also cause adjacent gardens to lose sunlight: Beech Gardens may be affected in the early morning and Bridgewater Street in the afternoon.

We have noted that the Heritage, Townscape & Visual Impact Assessment provided lacks thorough investigation into the visual impact of the development on the gardens and open spaces within the RPG. Specifically:

- analysis of any views from the open space at the west end of the Barbican Art Gallery.
- analysis of views further east of views 1-4

- The Golden Lane Estate Grade II RPG south side, Barbican Wildlife Gardens and Fann St within the immediate setting of the RPG may have views in winter of the new building and have not been investigated

There is a delicate balance between built form and the gardens at the moment which could be easily eroded by allowing expansion upwards above the adjacent Ben Johnson House, even by a small amount. We would ask, therefore, that the new building be lower than Ben Johnson House. In addition, the open space of the RPG has to serve a wide community as well as residents. The introduction of so many additional dwellings will add to the pressure on the gardens as the new, small roof garden is not going to make much of a contribution to local open space. The RPG may therefore suffer.

The following paragraphs of the National Planning Policy Framework support our observations:

Paragraph 205. 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.

Paragraph 206 states that: Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

In this instance, we would assess the level of harm to the RPG as a whole to be less than substantial.

We would be grateful to be reconsulted, should further information or amendments regarding these issues be submitted, and would be grateful to be advised of the outcome of the application in due course.

Yours sincerely,

Tamsin McMillan

Volunteer Support Officer and Acting Conservation Officer
The Gardens Trust

For further information, we refer you to the Gardens Trust publication The Planning System in England and the Protection of Historic Parks and Gardens (2024), which is available online at <https://thegardenstrust.org/wp-content/uploads/2016/10/Planning-System-in-England-and-Protection-of-Historic-Parks-and-Gardens-2016-v1.pdf>

From: Donal Rooney [REDACTED]
Sent: 29 August 2024 12:39
To: James, Samuel [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam
I would not have a problem with 7am as it is a residential usage.
Regards
Donal

From: James, Samuel [REDACTED]
Sent: Thursday, August 29, 2024 12:37 PM
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street
Importance: High

Hi Donal,

You can ignore the questions in my email from yesterday below, I think I've answered them myself.

However, I had one final question on this, if you could answer today would be most appreciated, as my report is due tomorrow morning.

The applicant wants to have the roof terrace and courtyard external amenity areas open at 7am instead of 8am (as per your recommended condition), as it is a residential use - would this be acceptable, or do we have to stick with 8am as the earliest time for these spaces to be open to residents?

Many thanks,



Samuel James
Planning Officer (Development Management)
City of London | Environment Department | Guildhall | London | EC2V 7HH
Telephone Number: [REDACTED]
www.cityoflondon.gov.uk

From: James, Samuel [REDACTED]
Sent: 28 August 2024 12:43
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Donal,

I hope you are well, and thanks again for the amended conditions you sent last week.

I've had a couple of queries from the applicant RE: your suggested conditions, please see the table below (column 1 is your condition wording, column 2 and 3 are the applicant's comments).

For the fume extract details, presumably we still need this as they have a communal kitchen for the co-living residents, and furthermore a public cafe is proposed where there could be a communal kitchen, so I'd say we need to keep this condition, do you agree?

For the air quality report, can you confirm if it is definitely required in this case please?

They have also asked for clarity over the lighting strategy condition - does this relate to both internal and external lighting?

Fume extraction details 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 commercial or communal kitchen use. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class E use takes place. REASON:In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.	Condition to be deleted.	This condition should be deleted as it is not applicable given there is no commercial kitchen or any kitchen flues.
Plant air quality report Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local	Condition to be deleted.	The scheme does not include any plant machinery (except

Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.

REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

for the emergency generator flue, which our air quality consultants have confirmed do not raise any air quality issues)

Many thanks,



Samuel James

Planning Officer (Development Management)

City of London | Environment Department | Guildhall | London | EC2V 7HH

Telephone Number: [REDACTED]

www.cityoflondon.gov.uk

From: Donal Rooney [REDACTED]
Sent: 21 August 2024 12:51
To: James, Samuel [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam,
Revised response attached.
Regards
Donal

From: James, Samuel [REDACTED]
Sent: Monday, August 19, 2024 8:00 AM
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Donal,

I hope you had a nice weekend.

This one needs to go to committee, so would you be able to amend your comments to reflect the below please, as this issue is likely to come up?

Many thanks,



Samuel James

Planning Officer (Development Management)

City of London | Environment Department | Guildhall | London | EC2V 7HH

Telephone Number: [REDACTED]

www.cityoflondon.gov.uk

From: James, Samuel [REDACTED]
Sent: 14 August 2024 12:31
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Thanks Donal,

If the courtyard us to be included, but they are able to use the spaces at weekends, are you able to amend your comments to reflect this please?

I also had a couple of objections relating to noise from the proposed private balconies (there are 5 at 8th floor level). Presumably we don't need to (nor would we be able to) control the hours of use of these private balconies?

Many thanks,



Samuel James

Planning Officer (Development Management)

City of London | Environment Department | Guildhall | London | EC2V 7HH

Telephone Number: [REDACTED]

www.cityoflondon.gov.uk

From: Donal Rooney [REDACTED]

Sent: 14 August 2024 12:17
To: James, Samuel [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam
Yes the courtyard needs to be included but I don't have a problem with weekend usage.
Regards
Donal

From: James, Samuel [REDACTED]
Sent: Wednesday, August 14, 2024 12:05 PM
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Thanks Donal - that's helpful.

Does the courtyard at ground level also need to be restricted to the same hours? Furthermore, do we need to say no weekend of the terrace at all, considering the residential nature of the use?

Many thanks,



Samuel James
Planning Officer (Development Management)
City of London | Environment Department | Guildhall | London | EC2V 7HH
Telephone Number: [REDACTED]
www.cityoflondon.gov.uk

From: Donal Rooney [REDACTED]
Sent: 14 August 2024 11:32
To: James, Samuel [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam,
Given that there is a restriction on music being played on the patio and the relatively small area involved I think that peoples voices during the recommended hours would be unlikely to have any significant noise impact on the surrounding area.
Regards
Donal

From: James, Samuel [REDACTED]
Sent: Wednesday, August 14, 2024 11:19 AM
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Donal,

I am currently writing this one up for committee - your comments attached.

We've had quite a few objections from surrounding neighbours regarding noise from the proposed amenity spaces: level 9 roof terrace, external (enclosed) ground floor courtyard and private balconies.

I note that you've recommended a condition relating to this: *The roof terraces on level 9 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.* Also for no music on the terraces.

As this is for a kind of housing, no use of the terrace at all at weekends could be an issue, but I understand if that condition needs to be there to protect surrounding residential amenity.

I also had a question as to whether you think the 8am-10pm use of the terrace seems acceptable, considering quite a few adjoining residents have objected to the terraces, use until 10pm every night could possible result in complaints - what do you think?

Happy to discuss.

Many thanks,

Sam



Samuel James
Planning Officer (Development Management)
City of London | Environment Department | Guildhall | London | EC2V 7HH
Telephone Number: [REDACTED]
www.cityoflondon.gov.uk

From: Donal Rooney [REDACTED]
Sent: 10 April 2024 10:06

To: James, Samuel [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam,
Sorry about that. The correct response is now attached.
Regards
Donal

From: James, Samuel [REDACTED]
Sent: Monday, April 8, 2024 8:59 AM
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Donal,

Apologies, I missed this on Friday, but the attached is for City of London Boys School - do you have the comments for Beech Street?

Many thanks,

Sam James - Planning Officer (Development Management)
Environment Department



Environment Department
City of London Corporation
London EC2P 2EJ

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From: Donal Rooney [REDACTED]
Sent: 05 April 2024 14:40
To: James, Samuel [REDACTED]; Whitehouse, Robin [REDACTED]
Cc: Smith, Alexander [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam,
Revised response attached.
Regards
Donal

From: James, Samuel [REDACTED]
Sent: Friday, April 5, 2024 2:17 PM
To: Donal Rooney [REDACTED]; Whitehouse, Robin [REDACTED]
Cc: Smith, Alexander [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Donal,

Thanks for coming back to me - Are you able to update your attached Memo with the additional comments please for the record, and so we can upload to public access?

Many thanks,

Sam James - Planning Officer (Development Management)
Environment Department



Environment Department
City of London Corporation
London EC2P 2EJ

www.cityoflondon.gov.uk

From: Donal Rooney [REDACTED]
Sent: 05 April 2024 13:12
To: James, Samuel [REDACTED]; Whitehouse, Robin [REDACTED]
Cc: Smith, Alexander [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam,

Can you add these conditions :

Prior to the commencement of the relevant works, a 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 Lighting SPD and the following policies of the Local Plan: DM10.1, 15.7 , CS15, emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036 and the City of London Lighting SPD 2023.

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

Regards
Donal

From: James, Samuel [REDACTED]
Sent: Friday, April 5, 2024 11:48 AM
To: Whitehouse, Robin [REDACTED]; Donal Rooney [REDACTED]
Cc: Smith, Alexander [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Robin and Donal,

Are the attached comments correct or did you need to amend anything?

Many thanks,

Sam James - Planning Officer (Development Management)
Environment Department



From: James, Samuel [REDACTED]
Sent: 19 March 2024 14:49
To: Whitehouse, Robin [REDACTED]; Smith, Alexander [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Robin, attached.

Apologies for the format but I had to take screenshots from IDOX as I couldn't find the original email.

Kind regards,

Sam James - Planning Officer (Development Management)
Environment Department



Environment Department
City of London Corporation
London EC2P 2EJ

www.cityoflondon.gov.uk

From: Whitehouse, Robin [REDACTED]
Sent: 19 March 2024 14:23
To: James, Samuel [REDACTED]
Subject: 24/01341/NPLN . 45 Beech Street

Hi Samuel,

My apologies if my team have contacted you already, Donal Rooney has commented on the application above (45 Beech Street) he is not in until Thursday and my manager needs to view the conditions suggested.

Kind regards



Robin Whitehouse | Pollution Control Team Manager

Telephone: [REDACTED] Mb [REDACTED]

City of London | Environment Department | Guildhall | London | EC2V 7HH
robin.whitehouse@cityoflondon.gov.uk | www.cityoflondon.gov.uk

-

Bob Roberts

Interim Executive Director Environment

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Gwyn Richards
Director of Planning and Development
Environment Department
City of London Corporation

Dear Mr Richards,

05 March 2024

Re: 24/00176/FULL – 45 Beech Street (the scheme)

I appreciate that the scheme proposes much needed residential accommodation, as well as preserving the structure of the existing building. However, I have the following concerns:

1. Height and massing

The proposed increase in both height and mass will have an adverse effect on residential amenity. A loss of both sunlight and daylight will affect Bryer Court, Bridgewater House, The Cobalt Building, Tudor Rose Court, Clarendon Court, Breton House and Ben Jonson House. In addition, those blocks, along with Shakespeare Tower, will be overlooked, resulting in a loss of privacy to a much greater extent than from the current office use.

2. Balconies and roof terrace

Shakespeare Tower, Bryer Court, Bridgewater House, Ben Jonson House and the Cobalt Building will also all be overlooked by the proposed balconies – not just the extended one on level 09 but also the less obtrusive one on level 08 – as well as the proposed roof terrace, also on level 09. As a result, their use is likely to result in a further loss of privacy and actual nuisance.

3. Design

The scheme's proposed change in the building's relationship with the Barbican Estate lessens the credibility of both. The proposed installation of barrel roofs not only degrades the Grade II listed blocks in the architects' attempted mimicry, that mimicry fails in the obvious lack of appreciation of the design of the Barbican roofs.

There are no more than two Barbican barrel roofs together with flat roofs to the next one. The architects have simply filled the roof space with barrel roofs, contributing an obvious insult to the Barbican's architects. Worse though, the Barbican barrel roofs are on a single plane, unlike the scheme's which are also on the return along Bridgewater Street. Even then, the two northerly barrel roofs on Bridgewater Street are lower than the others, looking lost because of a lack of design integrity.

The proposed facade is far too chunky and heavy. If the proposed window

surrounds are necessary because of the separate flats, then the facade needs a more creative and interesting design. The inclusion, in grey, of the eastern elevation of Bridgewater House - with its almost delicate rounded-top window but without its yellow brickwork - in the proposed eastern elevation of the building seems intentionally deceptive (DAS5.10). In fact, Bridgewater House is hardly mentioned in the application despite being, apart from Ironmongers' Hall, the only inter-war building left in the area but selectively using details of that building's exterior in an attempt to enliven the scheme's heavy, chunky facade is unjustifiable.

A complete external redesign is required. This has to highlight 45 Beech Street's independence from, and controlling influence on, the Barbican.

4. Accessible flats and escape from fire

At least the building has two staircases serving all its floors unlike the same architects' close-by Clarendon Court where only the ground floor links the two separate blocks above. It's perhaps appropriate that the image of Clarendon Court, referenced as Bernard Morgan House (3) in DAS 1.2, is virtually obliterated by the trees in Fortune Street Park. Having to look at it daily simply highlights other failings of that building.

However, most of the accessible flats in Clarendon Court, except, seemingly, 07/08, are close to lifts and staircases. For some reason, the northern of the two accessible flats on each floor of the scheme are the furthest away from the lifts and staircases. That cannot be acceptable.

5. Heritage Assessment

The Heritage Assessment in the submitted HTVIA (7.5, Part 2) omits reference to all the listed blocks of the Golden Lane Estate, including the Grade II* Crescent House. However, the GLE Grade II RPG is assessed. Further, there are separate references to the Barbican Grade II* RPG, the Barbican (Grade II*) and the Barbican (Grade II), all in all hardly showing a grasp of reality.

Although Bridgewater House was refurbished in 1985, during The Prudential's ownership, the palate of the original 1926 office building was replicated as far as possible. In 1995 the building was converted to mixed use to include 19 flats alongside the remaining office space. The conversion involved extending the sixth floor and adding a seventh, together with changes to the entrance from Bridgewater Square. In addition, several windows in the rear elevation were either bricked up or reduced in size.

Whilst the post war changes might prevent its listing, Bridgewater House has been an integral part of Bridgewater Square – which, unlike Bridgewater House, is included in the Barbican and Golden Lane CA - for almost 100 years. As such, Bridgewater House warrants recognition as a Non-Designated Heritage Asset and should be assessed accordingly. More detailed descriptions of both 45

Beech Street and Bridgewater House are in Appendix 1 and Appendix 2 respectively.

7. Waste collection

The proposal to create a dropped kerb close to the waste bin collection area has to be welcomed. It's an improvement on the architects' failure to ensure that there is a dropped kerb opposite the waste bin collection area at Clarendon Court as that would enable operatives drag waste bins to the RCVs without dropping them off the kerb. However, the current absence of a dropped kerb along virtually the whole of the western side of Bridgewater Street hardly aids accessibility, nor does the standing army of bollards.

8. The proposal to close access to Bridgewater Street off to traffic to and from Beech Street

Consideration should be given to the proposed closing off of the junction with Beech Street. Although not pursued by Streets and Walkways Sub-Committee when it rejected a modification of the aborted Zero Emissions Scheme, the proposal still appears to be live. The closure would, of course, have a significant impact on the proposed method of servicing the scheme.

8. Other points

Apart from the omission of all the GLE blocks and Bridgewater House from the heritage assessment, there are several other omissions and errors in the submitted HTVIA. Since the structure and footprint of the building is being retained, many are inconsequential. However, the absence of any specific reference to Bridgewater House suggests a lack of detailed knowledge of that building. More worryingly though, in respect of 45 Beech Street, is the assertion that planning permission 19/00062 "looks externally to have been implemented" (5.4 in HTVIA, Part 2). That suggests a complete lack of interest, as that approved scheme proposed moving the entrance on Beech Street to the east but that hasn't happened. A perusal of both the existing and proposed southern elevations posted to the planning portal for that application shows it to be obvious that no external implementation has taken place.

In the circumstances, please treat the above as my objection to the scheme.

Best regards,

Fred Rodgers

100 Breton House EC2Y 8PQ




45 Beech Street, Bryer Court and Bridgewater House from the roof of Ben Jonson House



Bridgewater House close up

APPENDIX 1

Murray House, 45 Beech Street

Below is an edited version of our response to the exclusion of 45 Beech Street from the proposed Barbican and Golden Lane Conservation Area (proposed CA).

In CoL's proposed CA Report to the Planning and Transportation Committee (P&TC) on 14 November 2017 (the November Report) the appraisal of 45 Beech Street stated:

The Central Point building on Bridgewater Street [sic] comprises a six-storey office building in Portland stone. A horizontal slab style block somewhat reminiscent of the Barbican residential slab block.

Our email to the then Director of the Department of the Built Environment (the DDBE) dated 09 November 2017 stated:

45 Beech Street - built as Murray House, which fronts that street and not Bridgewater Street - is not reminiscent of some Barbican Estate horizontal slab blocks. It was designed by Frank Scarlett in the post Festival of Britain style and built in 1956/1958, well before the Barbican was designed. If there is any reminiscence, then it may well be that the Barbican Estate was influenced by Murray House - even more justification for it being in the proposed CA. Details of the architect and the contractor, as well as its date, are clearly shown on 45 Beech Street. Why has no one in the Department bothered to look at 45 Beech Street? Its windows, doorway and other features are not original but, as with Bernard Morgan House, the main structure certainly is. More relevantly, 45 Beech Street, along with 1 Golden Lane, Bernard Morgan House and Eglwys Jewin determined the extent of the Barbican, with the former being responsible for the chip off Ben Jonson Highwalk.

In her email of 24 November 2017, the then Chief Planning Officer (CPO) wrote:

Pevsner considers the building to be an 'intrusion between the slabs of the N side' (referring to the Barbican Estate) 'Frank Scarlett's Murray House, completed 1958, a stone-faced and curtain-walled office block on Beech Street, begun before the N area' (of the Barbican) 'was incorporated in the plan'. This shows that the Barbican did indeed grow around Murray house - which was an impediment to the development of the north side of the Barbican Estate.

Our email to the then DDBE dated 12 December 2017 stated:

Whatever Pevsner's opinion of this building, at least, he knew when it was built and who its architect was. As it existed before the Barbican Estate was built, it cannot be an intrusion. That it was an impediment to the development of the north side of the Barbican should endorse its importance. Accepting that both 45 Beech Street and the Barbican Estate may have influenced each other is

progress. Doing so must also accept that the importance of the one to the other goes beyond any physical division.

The failures to not only acknowledge the identity of 45 Beech Street's architect but also Frank Scarlett's contribution to the Modernist Architecture Movement seems to confirm that the November Report was simply a hatchet job as regards Zone 2.

According to Pevsner, "Starlock" in Rye is "one of the first white cubic buildings in England which historians ought not to neglect". Other buildings, in London, by Frank Scarlett include the British Dental Association building, 64 Wimpole Street, Wellesley Court, Maida Vale, Ormonde Court, 364 Upper Richmond Road, Wallace Court, Old Marylebone Road, Templar House, Shoot Up Hill, Hampstead, Dicken's Estate, Parker's Row, Southwark and the Raglan Estate, Kentish Town.

The Church Commissioners sold the 45 Beech Street site to Trehaven Trust Ltd sometime prior to 1952, so it could have been incorporated into the Barbican Estate at that time had CoL bought it. Presumably CoL wasn't prepared to pay the asking price. Alternatively, as with both 1 Golden Lane and Eglwys Jewin, it prevaricated for so long that the Church Commissioners took another option.

In fact, CoL obtained a compulsory purchase order for a part of the north Barbican area in 1947— see plan— but failed to implement it fully. It also lost out in 1955 on the adjoining site the Black Horse pub, a survivor of the bombing and neighbouring 45 Beech Street on the west— see photo. Its site now forms part of the Barbican Estate. Tollemache's Breweries Ltd purchased the pub to in June 1955 before merging with Cobbold & Co Ltd in 1957. Presumably the pub then became surplus to requirements, allowing CoL to acquire it.

Additional points in our response to the public consultation on 12 February 2018 state:

In addition, the fact that Frank Scarlett was designing 45 Beech Street in 1953 seems to suggest a desperation on CoL's part, which the tentative "may" does nothing to contradict. Unless, of course, it is accepted that, like Bridgewater House, 45 Beech Street influenced the Barbican Estate. The November 2017 Report ignores the influence of 1 Golden Lane, Bridgewater House and 45 Beech Street on the Barbican Estate. One feature of the first two, incorporated into Barbican Estate residential blocks at a late stage - round-topped windows - is significantly contextual, despite CoL's claims in respect of Bridgewater House [that it failed to understand that building is original from 1926 but with a recladding in the 80s with the façade in the original colour palette and shape].

Our further response to the public consultation on 05 April 2018:

Between March 1952 and August 1953, Barbican Investments Ltd - apparently owned by Alderman Sir Sydney Cox - acquired 45 Beech Street and instructed Frank Scarlett, whose plans were lodged in August 1953. A report to Committee on 10 September 1953 refers to Frank Scarlet being in discussion with the then CPO regarding the development of the site on the east of Bridgewater Street, bounded by Beech Street (then the Barbican), Golden Lane, Cripplegate Street and Bridgewater Street, which was owned by CoL [later becoming part of the Barbican Estate].

It seems Sir Sydney wanted to lease CoL's site and the plans for Murray House show a "sterile" area on the east of Bridgewater Street to enable the new building to exceed the 51° angle from the buildings on CoL's site, rather than the building line. The then CPO considered such an arrangement would be acceptable only if there was a common freeholder and, instead, recommended selling a right of light to Barbican Investments Ltd, which it was calculated should be £4,000.

By March 1954, CoL had accepted an offer of £500 for its rights of light and planning permission for Murray House was granted on 22 March. However, before building work could commence, CoL had to obtain formal consent to enter into the rights of light agreement from the Minister of Housing and Local Government. CoL submitted its request on 2 April 1954 but formal consent was not forthcoming until 28 September 1954. The Minister was not happy being presented with a "fait accompli" and the

letter enclosing the consent concluded – “we have thought it best to give it; bring us into the picture at an earlier stage another time, we should be grateful”. It seems the potential loss of £500 to CoL was another determining factor.

CoL’s then CPO responded to being admonished by the Minister on “th” October 1954, claiming – “I think I should point out that the question of creating an easement did not arise in connection with the grant of conditional planning permission in May 1952, but when detailed plans were submitted for approval in March 1954”. Plus ça change!

In the circumstances, the appraisal in respect of 45 Beech Street also requires substantial revision, including the fact that, with it having been designed before the Barbican Estate was, there are no grounds for suggesting the latter had any influence on the former.

The CA Report to be presented to the P&TC on 08 October 2018 (the October Report) states:

45 Beech Street – a mid-1950s building which shaped the Barbican Estate, as the plot was not acquired at the time. The building can be said to have defined the edge of the estate but is not intrinsically significant.

Our response to the October Report, on 03 October 2018, states:

This building has an important historical and unique contribution to the development of the Barbican Estate, as well as the workings of CoL, as the documentary evidence provided shows. At the same time the building will be on the Culture Mile and the only non-Barbican Estate building visible in Beech Street.

CoL should, in any event, acknowledge that building’s importance by including it in the designation.

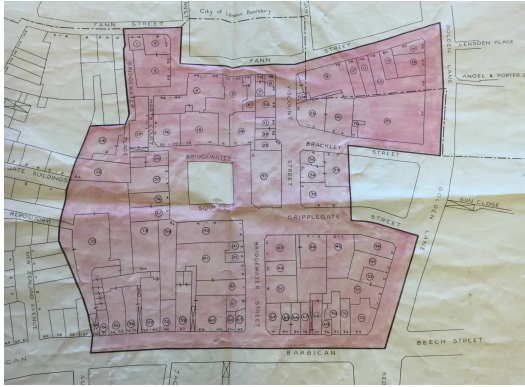
At the P&TC meeting on 08 October 2018,

A Member stated that he very much welcomed this report and felt that Officers had been very responsive to the views expressed as part of the public consultation process. He added that he was pleased to see that the proposals now included the Barbican Wildlife Gardens in their entirety. However, the fact that certain buildings were not to be included within the conservation area (specifically 45 Beech Street and the Welsh Jewin Church) appeared to be a missed opportunity. The Deputy Chairman stated that any redevelopment would have to consider the character of the adjoining Conservation area and that the importance of these buildings could therefore be recognised without having to necessarily include them within the proposed conservation area and adjust the boundaries.

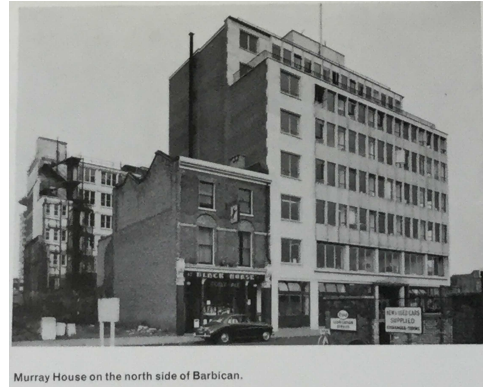
A second Member stated that she also felt that it was a mistake not to include these buildings within the conservation area and proposed an amendment seeking to adjust the proposed boundaries to include these. Another Member seconded this proposal and it was put to the vote. 9 voted in favour of the amendment and 10 against with 2 abstentions.

23 May 2023

F and J Rodgers



Plan from 1947 Compulsory Purchase Order



Murray House on the north side of Barbican.

APPENDIX 2

Bridgewater House, 6-9 Bridgewater Square

Below is a copy of my exchange with City Corporation (CoL) in respect of Bridgewater House regarding the proposed Barbican and Golden Lane Conservation Area. It was excluded along with 45 Beech Street.

Bridgewater House – CoL Report to Committee, November 2017

Bridgewater House, 6-9 Bridgewater Square – offices built originally in 1926, now residential with tall round headed windows and coloured brickwork by Prudential Architects c. 1985.

Bridgewater House - F Rodgers' response, 09 November 2017

As for Bridgewater House, 5/6 Bridgewater Square, a building dating back to 1926 is very rare in this area. However, whilst [the November 2017] Report refers to the tall round-headed windows by Prudential Assurance Architects c. 1985, these windows reference the windows of [BE] blocks with their barrelled vaults. Another detail missed by the department and the building should not be excluded from the CA simply to suit another agenda.

Bridgewater House - Annie Hampson email to F Rodgers, 24 November 2017,

The original 1926 building has been significantly altered. The round headed windows may reference the Barbican barrel vaults design, the material, 'coloured brickwork', but are at odds with the Barbican monotone palette or material.

Bridgewater House - F & J Rodgers response to consultation, 12 February 2018

It seems that both the Report and Annie Hampson are wrong. In September 1985, G Darwell, Prudential Architects submitted a planning application after it was discovered that there was corrosion to the vertical steel stanchions. This corrosion had led to surface cracking - a problem not uncommon with buildings of this age [around 1926] and having a steel structural frame with a ½ brick facing skin protecting the steel columns.

The remedial work proposed to prevent further decay of the columns involved cleaning and painting the steel work, for which the removal of the yellow brick piers in front of the stanchions must occur. It was intended that the piers would be replaced with a brick as near as match as possible as the existing yellow facing bricks are no longer manufactured.

Mr Darwell-Taylor concluded his written account "it should be said that The Prudential realises the quality of the building in question, and for that reason, accepts the need to do a first-class job and one that, following completion, will show no signs of it being repaired".

Thus, tall round headed windows and coloured brickwork appear to be a feature of the original building and not as a result of any structural changes in 1985 or when the building was converted into

flats around 1995. A photo from before, at least, the North Barbican, development commenced clearly shows the round-topped windows of Bridgewater House. However, in 1995, the sixth storey was extended and a seventh storey added.

Also, it seems that new windows were added at the ground floor level and the position of the entrance changed as part of the 1995 conversion. The developer was Brookcrest Properties Limited and the architects Keith Snell & Partners.

Bridgewater House - F & J Rodgers further response to consultation, 05 April 2018

A further inspection of planning unit file 1725 this week confirms that this building is, basically, as constructed in 1926 for J&K Connor Limited. The palette of the brick cladding is as near alike the original as possible but one full storey and a half storey have been added, probably in 1996, and there have also been minor alterations, including to the main entrance.

In the circumstances, the appraisal in respect of Bridgewater House in [the November 2017] Report requires substantial revision in order to confirm the history of this building since 1925. That revision should acknowledge both the building's palette and the arched windows, which pre-date the barrel roofs of the [BE] by around 40 years.

As the only surviving 1920s architecture in this part of the City, Bridgewater House provides a very important architectural contribution. That contribution requires respect rather than rejection.

Bridgewater House – CoL Report to Committee October 2018

Bridgewater House, 6-9 Bridgewater Square— built in 1926, it was one of the few buildings to survive the bombing of the area and subsequent redevelopment. The tall round headed windows appear to be an original feature, (corrected from original assessment) and the 1985 alterations and repairs were carried out with sensitivity— however the extension of the 6th storey, addition of a 7th, alteration of ground floor windows and moving the position of the entrance has significantly altered the building.



Bridgewater House pre completion of the Barbican



Bridgewater House, eastern elevation

05 March 2024

Fred Rodgers

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Dr Henry Irwig

Address: 302 Bryer Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Noise

Comment: Approval should contain the following conditions:

1. Restriction on hours of use of the communal spaces on the roof terrace and the ground floor courtyard. 8:00 am to 10:00 pm daily except on Sundays 10:00 am to 10:00 pm.
2. Specific requirements as to maximum levels of noise permitted, especially from the communal spaces on the roof terrace and the ground floor courtyard.
3. Installation and ongoing maintenance of noise monitoring and recording equipment to ensure adherence and provide evidence regarding compliance with the above.
3. Commitment to a 24/7 concierge whose contact information is made readily available to neighbours and who is explicitly charged with the responsibility of shutting down the communal spaces during off-hours or when noise levels become disturbing.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Ms WahFong Dart

Address: 234 Ben Jonson house London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Traffic or Highways

Comment: I feel that the building, although attempting to mimic the surrounding Barbican buildings, fails to achieve a convincing role and therefore devalues the existing heritage site. A redesign of the barrelled roofing so that it is more sympathetic to the surrounds would be preferable.

My main objection to the immediate approval of this plan is the effect of the site traffic routing on the surrounding roads. Although the developer has correctly identified the only possible access routes to the site, they fail to recognise that Bridgewater Street, Viscount Street and Brackley Street will all be already affected to some degree, either by obstruction or closure, by the existing work going on at the old Cripplegate Library, 1 Golden Lane. This building is currently undergoing partial demolition and refurbishment and is unlikely to be finished before 45 Beech Street commences its refurbishment. Therefore the potential for conflicting building works traffic is enormous and very likely very disruptive for the surrounding building residents given the narrowness of the roads and tight corners present. Also the use of Beech Street as an access point for the site appears potentially dangerous given the limited height of the Beech Street tunnel and the limited access to the site from the roadway of Beech Street. There is potential for damage to the tunnel structure and to pavements, as well as the disruption caused by road closures on Beech Street. The site is difficult to access but the developer's solution needs revising to account for existing building work and access difficulties. I therefore object on traffic and highways grounds and submit that the development is paused until Golden Lane development is completed

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

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Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Dr Robin Callender Smith

Address: Flat 43 Shakespeared Tower Barbican City of London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: This development will adversely effect my home. It will produce intrusive noise, dust and all the associated disruption of such major building projects.

As an elderly pensioner I will have limited ability to prevent the inevitable excesses in the start and finish timings of the work - and its associated pollution - and it will severely degrade the quality of my life and the investment made in Flat 43 for quiet enjoyment.

The height extension on the current building and the alterations proposed are all too close to an existing community which does not need this additional pastiche of a Grade 2 listed building.

Comments for Planning Application 24/00176/FULL

Application Summary

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Case Officer: Samuel James

Customer Details

Name: Mrs Jill Jones

Address: 62 Shakespeare Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: We object about the following

1. Proposed roof terrace will be a source of noise. The residents' entrance on the 9th floor terrace is likely to be an intense source of this noise in particular, and this entrance location is unclear on the plans. It is an improvement it has moved from the front of the building, in this iteration of the plans, but noise remains a concern.
2. Refurbishment management. Is there a plan? There will be significant noise from the demolition and rebuild, and it is unclear at what point vibration may impact the tower or podium, and over what sort of time period this will impact residents. Is there a civil engineering assessment? (our apologies if we missed this)
3. Unclear how this proposal fits in with the City of London's own plans for refurbishment of the podium level above Beech Street, especially in terms of when works might be carried out, to ensure the minimum disruption over the least amount of time to residents
4. Management and monitoring of anti-social behaviour. This is of great concern. It is unclear from the information what the target market is for the rooms other than a young demographic. It appears to be positioned as a long-stay self-catering hotel and modern student accommodation, and there is no doubt there is demand in London from young people to live somewhere safe, clean, and with excellent facilities. However, can we see hard evidence of success from the developers in successfully maintaining a youthful community within an older established community? What are typical issues and how have these been resolved? The operating plan is helpful, but unclear on how issues which may impact us as local residents e.g. noise, and other anti-social behaviour will be handled. Additionally, there appears to be little acknowledgement that

the presence of staff is a massive help in managing behaviour, and some staff numbers seem low e.g. 2 security guards, which we would hope is an obligation at all times, so that if one is unavailable

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Mr Simon Ricketts

Address: 92 Shakespeare Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment:Roof Garden & Foyer:

I object to the inevitable presence of unacceptable noise emanating from both locations and affecting Shakespeare. The undertaking to control noise is impractical and unconvincing. If there must be a social gathering place on the top floor, I propose that it possesses a sound-proofed roof and the walls comprise double or triple glazed windows. The foyer should be similarly protected.

SHM Ricketts CB

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

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Case Officer: Samuel James

Customer Details

Name: Mr Simon Martner

Address: 72 Defoe House, Barbican, London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: My bedroom window is exactly opposite the proposed development so I am concerned about the increased height of the building as well as the potential noise.

I appreciate that the party terrace has been moved to the opposite side of the building, this is good news. Will there be a concierge in the building to keep an eye on noise levels late at night?

On the original plans on the 45beechstreet website Option 1 and 2 kept the original building's footprint instead of increasing the height of it. This would be preferable in this area which is already densely populated.

Comments for Planning Application 24/00176/FULL

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Case Officer: Samuel James

Customer Details

Name: Mr Christopher Makin

Address: 21 Speed House Barbican London

Comment Details

Commenter Type: Alderman

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: This objection is based on the lack of an effective management plan for the communal areas - particularly the roof terrace and the proposed cafe on the ground floor - that could easily be a source of friction with neighbouring buildings.

The management plan should include restrictions on the hours of use for the communal roof terrace, the cafe and other shared areas likely to produce noise.

There should be a 24/7 manager whose contact information is known to neighbours. This role should be responsible for closing the communal spaces after hours and when noise levels are unacceptable.

Comments for Planning Application 24/00176/FULL

Application Summary

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Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Dr Jane Bickerton

Address: 207 Ben Jonson House Barbican 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 the proposed development at 45 Beech Street for the following reasons:

1. At present the building is used only as office space and hence only occupied during office hours during the week. The new development will convert the offices into flats and work space thus increasing the occupancy to seven days a week 24 hours a day. Looking at the figures it would seem there will be a similar number of people living in the proposed development as there are living at present in Ben Jonson House. This will bring about a major increase in traffic and pedestrian foot fall which, given the confined space of the site, would indicate a potential for increased noise and amenity disturbance to the area in Beech and Bridgewater Streets.
2. In addition, there is a significant risk of noise and disturbance from open windows in each of the flats as well as on the ground floor where there are community amenities not to mention the servicing of the building along with the effect of a large number of people living and working as well as socialising in this small site.
3. The plan also indicates that an additional floor will be added to the building thus changing the natural light access and environment in relation to Ben Jonson House at the western end. There is

a large outside terrace approximately 26 feet (8 metres) square proposed for the 9th floor at the back of the building and outside terraces at the front opposite Shakespeare Tower.

4. The We Work option in part of the building and a cafe along with a live music venue will generate more noise and amenity loss.

5. There is already concern about the traffic pollution generated by traffic on Beech Street and this development would need to be looked at carefully in the light of these issues. The cafe and the We Work proposals will need to be considered from environmental and ecological implications for the area as well as the servicing required.

Comments for Planning Application 24/00176/FULL

Application Summary

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Case Officer: Samuel James

Customer Details

Name: Dr Stephen Lubell

Address: 41 Percy Street Shrewsbury

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:As a frequent visitor to the Barbican I object to this planning application on several grounds: increased noise, loss of amenity value, negative impact on the environment, and disruptive implications for long established Barbican residents and home owners. I am also aware of other building projects in the area such as 1 Golden Lane and the major alterations to the Barbican Highwalk which are a source of dirt and noise to local residents. The confined and narrow space of the site will add to this disturbance. The project has the appearance of a high density hotel with added features such as the terrace, café and work spaces all of which could detract from the relatively quiet residential present nature of the area. The proposals also include music events which without adequate sound proofing would cause additional noise. In addition the major road access (Beech Street) is a major source of air pollution from vehicles and could well undergo substantial changes in the future. All of these issues need to be be considered carefully before granting planning permission for this project.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Mr John Taysum

Address: Bryer Court Beech Gardens, Barbican, London, City Of London EC2Y 8DE

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The proposed extra height and magnified vaulting would confuse the public's reading of the Barbican heritage assets, creating a prominence for 45 Beech St that it does not deserve and undermining their group value, which is the reason they are listed and it is not.

The proposed south and east elevations show 45's barrel vaults standing at least one metre taller than any of the Barbican Estate's barrel vaults; the south front vaults spring from a width two metres wider than the Estate's; as they turn the corner to the east, vaults differ, but all remain wider than the Estate's. I object to the barrel-vault pastiche entirely and suggest a linear roofline is more authentic to 45's origin and the Barbican setting. The proposals are at least one storey too tall as they would dominate even the Barbican top floor level flats north of Beech St. This takes attention away from the Barbican's group value and switches prominence to 45.

I support the change of use, but the density is excessive: the proposal is three times the number of dwellings at Bryer Ct, creating huge new demands on the neighbourhood. It is important that management and residents of 45 embrace the considerate living conditions CoL and the Barbican community have established here. There must be a condition of minimum 90 day tenancy to be consistent with the Barbican Estate. I could not find in the documents acknowledgement of CoL walkway byelaws that govern such things as noise and behaviour around Beech Gardens.

Bryer Ct is unusual in having external access decks to its flats; translucent glass panels have deliberate air gap overlaps so that air, but also sound and pollutants, can permeate to the flat entrances behind them. They face east to 45's west elevation, courtyard and roof recreation areas. The applicant should build in effective noise, smoke and cooking smell mitigation here; also volume and time limits are required for the sake of neighbouring residential amenity particularly for Bryer Ct.

Comments for Planning Application 24/00176/FULL

Application Summary

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Case Officer: Samuel James

Customer Details

Name: Mark Ormrod

Address: 94 Defoe House LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I object to this Proposal .

To live in this building will neither require commitment beyond a month nor oblige residents to pay local taxes. This is more along the lines of student accommodation rather than residents of an established community.

This style of living will inevitably attract young people seeking temporary accommodation, and who are prepared to share with others.

Noise levels, especially at weekends and during warm weather when people in tight living spaces are drawn outside, are likely to be significant and cause nuisance to Barbican residents.

The Barbican residents are themselves a very diverse range of people but, we are bound together by a set of rules, payment for local services and , within reason , a calm environment. This Proposal threatens the environment that has taken so much effort and long term commitment to create.

Adjei, William

From: PLN - Comments
Subject: FW: 45 Beech Street, EC2Y 8AD - 24/00176/FULL - Objection

From: Hennessey Jeffrey
Sent: Monday, March 25, 2024 4:27 PM
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Fwd: 45 Beech Street, EC2Y 8AD - 24/00176/FULL - Objection

THIS IS AN EXTERNAL EMAIL

Thank you for your letter dated 6th of March 2024 about this planning application.

Residential amenity - as you know, the bedrooms in Defoe House are at the back of our building. The application site is directly opposite. The proposed building includes balconies at level 8 that would look towards our dwellings. Gatherings on these balconies could well result in noise and disturbance to the detriment of residents in Defoe House. It would be difficult to draft a condition to limit hours of use since the balconies would be an integral part of the dwellings. Another option would be to delete them.

Otherwise we would be left, as proposed, to rely on the rather inadequate management plan. There are references at various sections of the document to the local community but in key parts, eg 3.11 Overnight Concierge/ Security, the text does not mention neighbours; the Welcome Pack 4.5 does not mention good neighbourliness. There is at the end at 5.4 a section on working with our neighbours for a safer place. This ought to be enhanced and be placed much earlier in the plan.

As a separate matter, I find aspects of the architectural treatment unpersuasive. The inclusion of barrel vaults is unnecessary. There is enough scope to design a building of its own character and quality that neither copies nor conflicts with the very strong Barbican context.

Jeff Hennessey Mr
55 Defoe House
Barbican
London EC2Y8DN

Neighbour

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Ms Mary Gilchrist

Address: 21 Shakespeare Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:OBJECT on grounds of adverse impact on neighbouring residents, specifically noise, disturbance and loss of amenity.

I have read the Operating Management Plan which has minimal information on how the operation of the development would be managed to ensure no adverse impact on its existing residential neighbours.

My concerns are:

Operating phase:

NOISE - noise from open 'amenity spaces' eg roof garden and foyer : if this development goes ahead these spaces must close by 10pm

EVENTS - if this development goes ahead no noise from events must be audible outside 45 Beech Street and events must end by 10pm

POLLUTION / HIGHWAY SAFETY / TRAFFIC GENERATION - if there is increased traffic to 45 Beech Street I query whether stopping and parking facilities including for services are adequate.

Construction phase:

NOISE AND POLLUTION - noise, vibration and pollution from construction work : in light of the appalling experience of the 1 Golden Lane development, if this development goes ahead working hours must be limited to 9am - 5pm Monday to Friday and the developer must put up acoustic barriers to block noise / vibration during the refurb

FAO: City of London Development Division

Ref: 45 BEECH STREET EC2Y 8AD COMMENTS ON PROPSALS (24/00176/FULL - 26/03/2024

As a Barbican resident, I am writing in response to your letter dated 6 March 2024, giving notice of the Full Planning Application proposals for the development of 45 Beech Street.

I attended an initial presentation at the building in September 21023 and submitted comments on the South elevation which remain essentially unaltered, and now include additional comment regarding increase in bulk at high level and loss of privacy.

My comments are as follows:

The elevation showing the apparent compatibility of the Beech Street elevation is misleading. Datum lines have been shown to suggest that the 'matching' barrel vaulted skyline proposed is slightly above the adjacent Ben Jonson House terraced roofline and slightly below the level of the Bryer Court stair tower, and therefore in keeping with its surroundings.

In response please note:

1. The barrel vaulted skyline of the expertly designed Barbican buildings is skillfully articulated, with setback volumes between the paired vaults creating an elegant modeling and presence, and reducing the mass.
2. By contrast, the proposed continuously sprung vaults of the 45 Beech street proposal create a bulky high level massing which is crude and out of proportion with the adjacent terraces.
3. The use of the Bryer Court stair tower as a height comparator is misleading. The tower is a single narrow slab structure which would be detrimentally dominant if extended.
4. The barrel vaults shown in the proposals are approximately four times (4x) the area of the original adjacent Barbican rooftop vaults. This is not only a clumsy architectural pastiche presented as sympathetic reference, but will create a significant loss of privacy to the residents opposite who would be in the direct sightlines of both residential windows and a new high level terracing.

Please note that the use of the current terrace is very occasional and the south facing facade windows onto the offices appear not to be used for window facing desk seating and working due to their orientation. This would not be the case with residential use.

5. Bringing forward the frontage above the existing terrace will create a significant increase in massing, adding to the ungainliness of the redeveloped block, with further loss of privacy to Barbican residents.

I would be grateful if these comments can be taken on board and the proposal disallowed on the basis of lack of sensitivity to the listed Barbican cityscape, and intrusion on existing residential privacy.

I have not commented on the extension of the other elevations as I do not know the existing aspects well and rely on others to do so.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Mr Richard Walter

Address: 102 Shakespeare Tower The Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I overlook the site from my 10th floor flat and am very concerned about 1) the potential, but inevitable noise that will be generated both by the roof terrace and the foyer events, 2) the very probable increase in anti-social behaviour that will result from public events and 3) the large increase in footfall. I am also concerned about the noise during the period of construction. I appreciate that this is, to some extent unavoidable, but hope that you will ensure the minimum discomfort to the Barbican Estate residents.

Gwyn Richards
 Director of Planning and Development
 Environment Department
 City of London Corporation
 gwyn.richards@cityoflondon.gov.uk

Dear Mr Richards,

Re: 24/00176/FULL – 45 Beech Street Redevelopment

There are several issues with the 45 Beech St redevelopment proposal that need further consideration before I could recommend approval. Until these are done, please consider this as an objection to this development.

- 1) Potential for Noise when completed. The planned use will attract a different, younger demographic to that living in the adjacent Barbican Estate, which is largely made up of more elderly residents and families with young children. According to the proposal, the development is mainly aimed at young professionals working in the City of London and surrounding areas on a relatively short term basis. Consequently, it is unlikely that they will have the same level of consideration for Barbican residents as do those already living in the Barbican Estate. Any noisy behaviours on the new balconies and on the roof terraces would be very detrimental to those Barbican residents who are adjacent to 45 Beech St including Ben Johnson House, Bryer Court, Breton House and Shakespeare Tower, as well as residential units which are not part of the Barbican Estate.

There are two particular aspects which I feel should be dropped from the proposal and a further issue that requires more information from the developer.

- i) The roof terrace on the 9th floor, will have the potential to be a significant noise source as groups use it to socialise and party. Many residents in Shakespeare Tower can see this space. If they can see it they will hear whatever noise is made there. I strongly believe that this feature should be dropped from the plan. Providing acoustic shielding of the area might be of some benefit to low lying Shakespeare Tower flats but is unlikely, for reasons of practicable geometries, to be effective in reducing noise for higher floors. Consequently, dropping the roof terrace from the proposal is the only option that takes maintaining resident amenity into account.
- ii) Live Music in the Foyer. The proposal states that weekly events are to be held in the ground floor foyer, otherwise called the 'Café and Co-working Hub', including live music. However, it does not state what this will entail. Given the youngish demographic, it seems likely that the music will be amplified electric and the thought of outputs of a few hundred watts fills one with dread as the bass frequency vibrations would undoubtedly be felt in surrounding residential buildings.

The Barbican Arts Centre is in the midst of the Barbican residential estate, but the events it puts on take place deep within the building which acts to mute any noise. In addition we have regular Resident-Barbican Centre liaison meetings to manage in advance any unusual events where noise might become a problem. In the main, this works very well. For example, the outdoor cinema events take place using

headphones and I am not aware that there has ever been a complaint about noise. The Barbican Centre ensures residents are not disturbed.

Events in 45 Beech St will not be happening within the bowels of a building like the Arts Centre but in the foyer which is separated from the outside world by a single windowed outer wall. Even if the windows remain closed the level of noise would likely be high but in summer it is probable that windows would be open, which would mean noise levels would be very, very high.

I strongly believe that amplified music performances should not be allowed in the foyer as they will cause distress to close-by Barbican residents.

- iii) In addition, the developer should articulate how he will control such Foyer events. There is an implication in Paragraph 1.6 of the 'Operational Management Plan – Revised' that these events will be open to the public and how public access and control is to be effected needs to be understood before allowing any such events.
 - iv) The proposal mentions the management of anti-social behaviour (ASB) but is short on detail. The points raised in i), ii) and iii) above would eliminate much of what would be antisocial to Barbican residents. This would leave noise from individual residential units such as noisy parties and noise made on balconies etc. The proposal notes that the Company will react to complaints but do not say how ASB will be stopped quickly. Their ASB Management Plan should be developed in greater detail before a planning decision is made. This should also include how any public access events (as in iii) above) will be managed.
- 2) Noise during construction. That this application involves a mixture of redevelopment of an existing office block along with the construction of two new floors makes 45 Beech St similar, in principle, to that of the current development at 1 Golden Lane. From our lower floor flat in Shakespeare Tower, we have heard the noise created by the 1 Golden Lane project from day one. It has been prolonged, often hugely disturbing and has been disruptive to my work (I do academic research mainly from home). The only saving grace has been that Ben Johnson House is interposed between 1 Golden Lane and my flat and this has probably reduced the noise levels a bit. There will be no such barrier between 45 Beech St and Shakespeare Tower and 45 Beech St is, according to the developer's plans, only about 40 metres away from Shakespeare Tower, compared with the 100 metres that separate us from 1 Golden Lane. Consequently, I expect the construction noise at Shakespeare Tower from 45 Beech St to be significantly worse¹ than from 1 Golden Lane and thus to be very detrimental to residents, living and working in there.

Some residents who work ex-Barbican and look forward to weekends with their families have been disappointed that the work at 1 Golden Lane has been allowed on Saturday mornings, eliminating quiet from one quarter of their weekend. There should be no Saturday working at 45 Beech St.

¹Given that the inverse square law applies, the increase in intensity will be $(100/40)^2 = 6.25$ and, without the attenuation of Ben Johnson House, it will be higher still, let's say 10 times as bad.

Another factor which has already been raised with the developer but is not commented upon in the plan is when the build process will take place. It was pointed out that since Barbican apartments are not air-conditioned and there is a significant solar loading during the summer, it is essential that during these months flats have to have multiple windows open to manage the internal temperature. Open windows mean maximum noise. So summer construction will be extremely noisy, whereas winter working when windows are closed will be more tolerable. I'm disappointed that the developer has not tried to engage in more detail with residents to see if a practical plan to minimise the impact of construction noise could be worked out.

I note that the application includes an 'Outline Construction Logistics Plan' and a 'Noise & Vibration Impact Assessment' which are requirements of the planning process. However, as far as I can see, neither deals in any detail with assessment of disturbance to residents.

Before this application is considered, I request that the developer produce a noise impact management plan to explain how they will keep noise heard by Barbican residents to a minimum. It could be that acoustic barriers would help.

- 3) Design of the south and east elevations. The proposed design replicates the barrel roofs of the Barbican low-level blocks. In principle this is quite a neat idea that blends to an extent with existing Barbican buildings. However, I am aware from discussion with some residents that even this may look out of kilter with the existing estate in that the density of barrel roofs is greater than on the estate blocks. To ensure that the proposed building does not look out of place, I recommend that the City, which has a duty to ensure that the architecture heritage is not degraded, engage with a body of experts dealing with architectural heritage (perhaps, the 20th Century Society) to assess the impact of the design and that it only proceed as a design if and when the selected body comments favourably.

As I stated at the start of this letter, I wish to object to this Planning Application. However, if the elements which gave rise to the specific objections which I have discussed above were to be eliminated, I would likely endorse an amended proposal.

As an afterthought, most City of London planning applications involve dozens of documents which makes for very onerous study by the layman and may deter many residents from commenting at all. It would be very useful if there was a document specifically dealing with the issues that had been raised by residents which would provide a quick overview of the application and its impact on residents. Perhaps this is something you might consider in future.

Yours sincerely

Dr Alexander Wilson
52 Shakespeare Tower

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Mrs Alexander Wilson

Address: 52 Shakespeare Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I object to this application for two reasons: i) noise in operation and ii) noise during construction.

i) I think there is a high probability that the proposal as it stands will cause high levels of noise when the building is in full operation. The most worrying potential noise sources are the 9th floor roof terrace, which will undoubtedly be used for socialising and partying, and the holding of live music events in the ground floor common area. I would like to see both of these dropped from the plan.

I also note that the clientele which the developer hopes to attract will be young professionals on short duration lets and I worry that their consideration for the residents of the Barbican will be lacking. I am unconvinced that the management will be able to instil a culture that will prevent noise from balconies and the like or that they will be able to shut down any such noise effectively.

ii) I also note that this development is about 40 to 50 yards from my flat in Shakespeare Tower and that, if my experience of other recent building projects (e.g. 1 Golden Lane) is anything to go by, the noise generated by this project will be unbearable. 45 Beech St is much closer than 1 Golden Lane (<50 yards vs >100 yards) and so the noise will be that much worse. This will be especially so in summer when I have to have windows open to moderate the temperature in my non-air-conditioned apartment.

I frankly did not see anything in the documents that suggested that the developer had given serious consideration to the needs of Barbican residents either during construction or when in use.

For these reasons I object to the development going ahead.

Begum, Shupi

From: Mary Gilchrist [REDACTED]
Sent: 26 March 2024 08:51
To: PLN - Comments
Subject: Re: Comments for Planning Application 24/00176/FULL - 1) original comment not showing on website 2) additional comment 3) please acknowledge receipt of this email

THIS IS AN EXTERNAL EMAIL

Dear Mr James

I have commented via the website (6.20pm yesterday) but at time of writing my comment is not showing on the website.

I also have one additional comment:

If this development goes ahead, I would like to see a proportion of the rooms ringfenced at a reduced rent for key and emergency workers. This would be a genuine contribution to local amenity and more valuable than eg a cafe open to the public.

Please acknowledge receipt of this email.

Yours sincerely

Mary Gilchrist
[REDACTED]

From: PlnComments@cityoflondon.gov.uk <PlnComments@cityoflondon.gov.uk>
Sent: 25 March 2024 18:20
To: [REDACTED]
Subject: Comments for Planning Application 24/00176/FULL

Comments for Planning Application 24/00176/FULL

Dear Sir/Madam,
Ms Mary Gilchrist,

You have been sent this email because you or somebody else has submitted a comment on a Planning Application to your local authority using your email address. A summary of your comments is provided below. Comments were submitted at 25/03/2024 6:20 PM from Ms Mary Gilchrist.

Application Summary

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

[Click for further information](#)

Customer Details

Name: Ms Mary Gilchrist
Email: [REDACTED]
Address: 21 Shakespeare Tower London EC2Y 8DR

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comments: OBJECT on grounds of adverse impact on neighbouring residents, specifically noise, disturbance and loss of amenity.

I have read the Operating Management Plan which has minimal information on how the operation of the development would be managed to ensure no adverse impact on its existing residential neighbours.

My concerns are:

Operating phase:

NOISE - noise from open 'amenity spaces' eg roof garden and foyer : if this development goes ahead these spaces must close by 10pm
EVENTS - if this development goes ahead no noise from events must be audible outside 45 Beech Street and events must end by 10pm
POLLUTION / HIGHWAY SAFETY / TRAFFIC GENERATION - if there is increased traffic to 45 Beech Street I query whether stopping and parking facilities including for services are adequate.

Construction phase:

NOISE AND POLLUTION - noise, vibration and pollution from construction work : in light of the appalling experience of the 1 Golden Lane development, if this development goes ahead working hours must be limited to 9am - 5pm Monday to Friday and the developer must put up acoustic barriers to block noise / vibration during the refurb

Kind regards

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Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Dr Alexander Wilson

Address: 52 Shakespeare Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I have sent an objection, the text of which is longer than can be accommodated here, under separate cover to Gwyn Richards, Director of Planning and Development at gwyn.richards@cityoflondon.gov.uk.

Alexander Wilson

Shakespeare Tower

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Mr Alex Castle

Address: 23 Shakespeare Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: 45 Beech Street is to be repurposed into studio homes designed for young people. I have no objection in principle but there is high risk that noise disruption will impact residents in Shakespeare Tower and Ben Johnson House. The way the Barbican Estate is managed and the nature of tenancies means there is very little noise from gatherings, parties etc. The private terrace space on the 8th floor and the communal terrace on the 9th floor will almost certainly create unreasonable noise for Barbican residents. I believe the plan should be revised to remove terrace space.

The developer notes the proposal "will repurpose the building as a residential community which is more in keeping with the surrounding area". This is not accurate. The surrounding area of the Barbican is generally office space (where there is no noise pollution) and the Barbican itself has strict rules for lease-holders and a strong culture of not disturbing neighbours.

The proposal as it currently stands will certainly lead to noise pollution and disruption to quality of life for Barbican residents.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Ms Elizabeth Fotheringham

Address: 33 Shakespeare Tower Barbican, London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: My family and I live on the 3rd floor of Shakespeare Tower which faces the proposed development. I have previously raised these points with the developers, but did not receive a reply.

I object on the following grounds:

1. The proposed height and massing of the building.
2. Our flat will be overlooked.

The design will build up to the height of the mobile phone masts that currently stand on the top of the existing building. This will make the occupied mass of the building considerably taller and wider. We are only on the third floor of Shakespeare Tower so this will directly affect our light and our view. We will be more overlooked. It is possible that our view of the winged building on the Golden Lane Estate will be blocked by the new floors and, in any event, we will see much less sky.

In addition, the top floors will no longer be stepped back, as they are currently. This will worsen the massing and dominating effect described above. It will be particularly marked for us on the third floor, as with all the lower towerblock flats on the north elevation. Our entire flat is spread along that north elevation so the development is taking light from every single room.

3. Noise from communal spaces

The design incorporates a communal use balcony. We are concerned about noise from this and from the ground floor entrance space.

4. Noise and construction

We are so, so very close to where the developers hope to be carrying out the work, with all the associated noise and dust. We have had no offers or plans of how the developer will help with our family live with this. We will need to undertake extra cleaning, we will probably suffer curtain and carpet damage and most of all, there will be the stress of living with such noisy, long-drawn out works. As stated above, our entire flat is along the elevation that looks out onto 45 Beech Street, so we cannot go elsewhere inside our flat to escape the noise or open windows on a different elevation.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Ms Helena Twist

Address: 501 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I live directly facing this building.

1. Adding 2 stories to this building will cause loss of light to my property and an intrusion on my privacy.

2. Most concerning is the likely impact of noise since :

- a proposal is to provide live music to residents, a crazy idea in this densely residential area
- potential noise from the actual dwellings in the summer when windows are open
- noise from events from the proposed terrace at 9th floor level.

The building functions very well at present as office space.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Miss Rebecca Smithers

Address: 317 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I live in Ben Jonson House and am extremely concerned by the proposals to change the use of the existing building to a live-work model.

Not least is the loss of daylight/sunlight, along with the impact of the planned additional height of the building negatively affecting privacy of Barbican residents. This development is inappropriate given the likely effect of noise and live music on a residential area with many elderly residents. We are already battling the side-effects of activities like parkour which attracts noise through music and filming etc.

Thank you,

RS

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Mr Duncan Finch

Address: 522 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am objecting based on heritage/townscape considerations. This application is important due to its adjacency to Beech Gardens, one of the key landscape set-pieces within the Grade 2* Listed RHPG. Ongoing works to improve these beautiful, popular gardens, including the long-overdue removal of the unsightly link corridor, will be transformative. It would be tragic if, just as this is achieved, the character of the area were to be adversely impacted by this ill-considered design.

The DAS and Heritage Assessment play down the impact of increased mass. However, the fact that the new building will not exceed the 'shoulder' & overall height of adjacent buildings within the Barbican Estate is irrelevant. As its new upper floors thrust forward from the previous building line, and beyond the line of its neighbours, they will appear much more dominant. This impact is exacerbated by one of the existing building's most jarring aspects (incredibly not addressed in the submission), made worse by the proposals: the south facade is not aligned with the Barbican. These factors cause the new building to obscure the corner of Ben Jonson from the West, degrading the visual power of its linear form.

When the adjacent portions of the Barbican were designed, 45 Beech Street was built, and therefore factored into design decisions. It currently acts as the 'shadow gap' between Ben Jonson and the linked Bryer/Bunyan/John Trundle group. This subtle articulation would be destroyed.

In essence, the design's blandness obscures its role in the creeping degradation of the Barbican's setting. While every proposal around the estate's perimeter will have included a heritage

assessment advising that any harm caused would be 'less than substantial', the combined effect has been anything but, with certain schemes seriously impacting key views (eg 21 Moorfields). It may seem unfair to reject something so insipid, but it is crucial that the City puts down a marker now that they take heritage seriously.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Dr Jane Bickerton

Address: 207 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I wish to object to this proposed development on the following additional grounds:

The present Blake Tower owned by the City Corporation (formerly called the Barbican Y) was converted into 74 self-contained flats in 2015/16 by Redrow Homes. In its previous life as the local YMCA for many years, it contained 218 bedrooms along with a ground floor reception area, communal lounge, a gymnasium and dance studios on floors 1-2, a canteen and kitchen area in the lower ground level and storage and meeting rooms in the basement. 45 Beech Street is a much smaller, confined site and was not designed residential. The proposed 174 private rooms each measure between 19 and 37 sqm and contain an en-suite shower room and kitchenette and as a co-living site will have a co-working space, a Café/lounge, a Shared kitchen, a Private dining room, a Multi-function room, a Gym, a TV room, Laundry and drying facilities and Bedding and linen changing and/or room cleaning services.

Whilst it was considered possible at the time to convert Blake Tower it seems that the Beech Street plan proposes to squeeze as many as possible co-living rooms into the existing tight office footprint at 45 Beech Street.

Beech Street is not at all appropriate for such use as opposed to the Blake Tower, which has much more external and better circulation spaces, while at the same time still being within the radius of the Barbican estate and within easy access to the cultural assets of the Barbican quarter. The impact on the existing Barbican estate layout and residents will be far more intrusive with 45 Beech Street than was the case with the Fann Street site. I wish to point out that I am not opposed

in principle to co-living developments as such, but in this case the location is a major problem and there maybe more appropriate sites.

Objections to the Planning Permission Application for 45 Beech Street London EC2Y 8AD

FOR THE ATTENTION OF THE CASE OFFICER SAMUEL JAMES

YOUR REF: 24/00176/FULL

This e mail is from the Ben Jonson House Group Committee on behalf of Ben Jonson House

It is extensive because we think the Application raises many elements of concern.

We totally accept and support the City of London Planning policy (including emerging City Plan 2040) especially in relation to living accommodation in the City. However, in light of the proposed significantly changed nature of 45 Beech Street and the intensity of its proposed use which will undoubtedly cause a change in the character to the existing quiet residential neighbourhood which a planning permission of this type should not do and is completely unsuitable to the surrounding area in its existing form, we **OBJECT** to the proposals in the **Planning Application 24/00176/FULL** for the following reasons:

1. HEIGHT/MASS/LOSS OF LIGHT AND DAYLIGHT

The proposed new building will fill in the space between Bridgewater House to the north and the existing Building to the south. The height will be increased by a considerable amount for its entire length to a height greatly in excess of the apex of Bridgewater House – itself already a high (but fortunately narrow) building and completely changing the surrounding area. This is instead of the reducing height of the existing building as it goes northwards which allows light to adjoining buildings.

This additional height is extreme in the context of surrounding buildings and will cause a significant loss of light not only to Ben Jonson House (BJH in this section) but also other buildings.

Specifically as regards BJH, there will be a significant loss of light (both sunlight and light generally) to the flats at the rear of BJH and especially to the three flats at levels 2, 3 and 5 on the western end of BJH with windows directly onto Bridgewater Street.

Bridgewater Street will become something approaching a chasm as 45 Beech Street is extremely close to BJH and the additional height will make the road tunnel-like.

Adding it to the proposed significant additional height of Cripplegate House 1 Golden Lane which is currently in the course of construction - having been given permission in late 2022 - this will adversely affect Ben Jonson House. We have not yet seen in practice what the effect of this will be to light to Ben Jonson House and in the area generally, but it will undoubtedly be significant to a negative degree and the additional proposals for 45 Beech Street will aggravate this markedly.

Overall, this proposed development will give significant additional massing and the confluence of planning permissions will together potentially create an adverse effect on BJH, the Cobalt Building and the area generally.

Finally, the Anstey Horne Daylight and Sunlight Proposed Accommodation Report dated 26 January 2024 seems sparing in its support for the proposal.

2. DESIGN OF THE PROPOSED NEW BUILDING

The copying of the barrel-vaulted roof motif feels like an inappropriate pastiche of the original Barbican estate. A decisively different and contrasting articulation of the roofscape, which does not compete with the design of the precedent, may have been more successful. This is clearly evidenced by the wide barrel-vaulted roofs along the southern elevation of the proposed development, which appear too large and heavy by comparison. Instead, in architectural terms, they should have been smaller and subservient to those of the neighbouring Grade II listed Ben Jonson House, John Trundle Court, Bunyan Court and Bryer Court.

3. TERRACE AT LEVEL 9 AT THE REAR

The proposed large open air terrace at 9th floor level approximately 26 feet (8 metres) square to the rear of the Building where it abuts Bridgewater House will cause noise and disturbance. Parties have occurred on a very rare basis (the last was over two years ago) on the terrace on the top floor of the Cobalt Building going into the early morning and they are extraordinarily disturbing. Effectively, it is impossible to sleep.

The new terrace at 45 Beech Street will be at more or less the same height and will be used constantly and presumably for socialising and partying. This will specifically have a potential adverse effect on all flats on the north and west ends of Ben Jonson House, to Cobalt Building and to Bridgewater House causing noise and disturbance.

From the drawings, the balustrade overlooking Bridgewater Street is not high enough to shield people and create a sound barrier. It clearly shows people able to look over it which will create even more potential noise and disturbance.

Please see point 10 below as to limitations of hours of use of this area.

4. FIVE BALCONIES AT LEVEL 8

The five terraces at Level 8 which will be on the south face of 45 Beech Street will, together with the opening windows of the flats along Bridgewater Street and the Terrace at Level 9, cause noise and disturbance around the whole of the south and east faces of 45 Beech Street to flats on the west and southern faces of Ben Jonson House as well as to the flats on the north side of Ben Jonson House.

As most of the flats in Ben Jonson House face both south and north, they will experience the noise and disturbance from both directions.

In light of the concrete nature of the surrounding buildings and quiet area generally, even low noise late at night is disturbing.

5. OUTSIDE COURTYARD AREA AT BASEMENT AREA BUT OPEN ALL THE WAY UP THE BUILDING

Being adjacent to Bridgewater House, Ben Jonson House and Cobalt House, this area will be used for socialising and presumably partying. The potential for noise and disturbance is obvious.

6. CAFÉ 24/7 ALSO OPEN TO THE PUBLIC WITH OPENABLE WINDOWS TO BRIDGEWATER STREET

The barista café/lounge will be open to residents "24/7". It will also be open to the public 7am-5pm which will mean a further addition of people going to the Building starting very early. As the windows are openable onto Bridgewater Street, this means that potentially there will be noise and disturbance 24/7.

7. COMMUNAL KITCHENS WITH OPENABLE WINDOWS TO BRIDGEWATER STREET

There will be a communal kitchen potentially used by up to 348 residents (see point 11 below) and presumably management and support staff. The kitchen has three full width openable windows opening directly onto Bridgewater Street and possibly also onto Beech Street (the plans are not clear). This will inevitably cause noise and disturbance from early in the morning 7 days a week ie including Sundays.

8. OPENABLE WINDOWS IN ALL FLATS 79 OF WHICH ABUT BRIDGEWATER STREET ALONE

All 174 flats have openable windows we were advised by the developers and this is clear from the plans. This will cause inevitable noise and disturbance to all areas on the north, south, east and west boundaries of 45 Beech Street including the Podium (which is to be enjoyed by the public). There are 79 flats facing Bridgewater Street alone. This will specifically adversely affect Ben Jonson House which abuts Bridgewater Street. In addition to people talking and smoking, there will also be the possibility of music and even cooking smells from the internal kitchenettes.

9. NOISE GENERALLY IN THE BARBICAN AREA

Newcomers to the area do not realise how much sound reverberates around the Barbican because of its concrete construction. And also because it is a constitutionally quiet area despite having a large number of residences. Even a single voice can be disturbing at night.

10. LIMITATION ON HOURS OF USE OF OPEN SPACES

The planning permission for 1 Golden Lane has included a condition limiting use of the roof terraces and outside areas from 9 am to 6 pm to protect surrounding premises. A similar condition should be imposed on use of all outside areas including those parts of 45 Beech Street referred to at points 3 to 6 above as this remains a commercial building and will not be just a block of flats.

11. INTENSITY OF PROPOSED USE OF 45 BEECH STREET

Currently the building is used as offices in a quiet residential area and has given no problem from the user point of view. Most of the time you would hardly know it is there.

The proposal is for a premises supposedly small studio “private rooms” but in practice something more like a hotel/conference centre/hall of residence presumably for young people - with 174 bedrooms with double beds and communal living and facilities including live music.

Nothing is said in the Draft Management Plan about limiting numbers in each studio private room which gives the potential for **348** residents in the building at any one time together with all management and staff and visitors. Nothing is said in the Draft Management Plan about single occupancy and In today’s world, one must expect that a good number of the intended occupants will have partners with whom they may wish to share the bedrooms. It seems hard to believe that partners will not be allowed in the rooms and this is certainly not stated in the Draft Management Plan. The building will be used 24 hours a day 365 days a year and there will be constant hubbub generally much greater than in a simple block of flats.

It will be suitable for a younger demographic who are more inclined to socialise and make additional noise to older demographics (this is not a criticism). Potentially it will create a buzzing atmosphere around the building with constant movement all hours of the day and night. A complete change from the quiet atmosphere at present.

Terms and provisions of any leases or tenancy agreements are not specified in the Draft Management Plan except that they may be not less than one month’s duration. So they could be anything. These ought to be made clear and suitable and contained as Planning Conditions in any Planning Permission which may be granted.

12. CO-WORKING HUB

This space will also be open to the public if they purchase a membership and are just inside the entrance lobby to the building. This will mean further additional footfall to the premises.

This hub **along with the Café** will be set on either side of the entrance lobby to the building. This publicly accessible area will host weekly events including **live music**, educational talks as well as flexible everyday working stations and areas for a range of social interaction.

These areas will be open to the public and will include a recording studio.

It is obvious that when the front doors of 45 Beech Street are open (even if on an open and close basis) noise will filtrate outwards to the surrounding area causing yet more noise and disturbance.

It should be remembered that there are many similar services already available in the Barbican itself and the costs of same need to be recovered.

13. LIVE MUSIC/RECORDING

The reference to live music and recording in the Co-Working Hub is of especial concern. Any areas used for live music or recording should have sound proofing and also limited to certain hours of use so as not to create noise and disturbance for surrounding residents including specifically Ben Jonson House which abuts 45 Beech Street. This was done for the cinemas at the other end of the Barbican Tunnel and that should be repeated here.

14. EVENTS

The owner will curate events within the Building including presumably some of the outside spaces to include supper clubs, workshops, guest speakers, performances, art exhibitions, pop-ups, fitness classes and community inspired projects. It will also facilitate its residents to run their own events and programmes.

Again this will cause additional footfall to the premises with concomitant noise and disturbance. No effort is shown in the Draft Management Plan to protect (or even consider) the requirements of residents living in the immediate vicinity.

15. NO NOISE ASSESSMENT RELATING TO EFFECT ON SURROUNDING BUILDINGS AND AREAS

The Noise and Vibration Impact Assessment Report forming part of the Application is a long technical document that gives attention to the needs of the occupants of 45 Beech Street but very little (if anything) about the Development's effect on surrounding buildings. Accordingly there is an absence of a proper Noise Assessment on surrounding buildings and areas and no evidence that this has been given proper consideration.

The conclusion of the Report also admits that a "suitably worded planning condition may be applied to cover building services plant noise emissions, on the basis that the final design proposals have not yet been developed". So this element of the design has not yet been done.

16. EXTRACTION - FANS AND SMELLS

All extraction from food smells should be Inside the building and concealed in accordance with City of London Local Plans. This is not properly addressed in the supporting documentation with the Planning Application.

The same Restrictions as for restaurants in the area like Cote at the end of the Barbican Tunnel must be adhered to. Although now dealt with in the main, residents in surrounding flats suffered significantly for a long time from restaurant/extraction smells from Cote and this should not be repeated.

17. SERVICES AND SERVICING

Providing all the services to this proposed intensely used building with multiple uses will mean a significant number of deliveries causing further noise and disturbance. Most of them will have to be in Bridgewater Street (abutting Ben Jonson House) as there is nowhere else for them to be other than Beech Street itself which will not be possible because it is a

thoroughfare. There will be serious interruption to traffic flow, increased pollution, dustcarts, noise and disturbance and worse if Bridgewater Street is closed at its junction with Beech Street as has often been the case and is mooted from time to time by the Corporation of London. All this must be added to the increased servicing for Cripplegate House 1 Golden Lane in this area which will cause noise and disturbance.

As 45 Beech Street is so close to Ben Jonson House in Bridgewater Street, deliveries to 45 Beech Street should be limited as they are to Cote Restaurant at the end of the Beech Street Tunnel. This should be no earlier than 8.30 am on weekdays, 10 am on Saturdays and no deliveries on Sundays. A Planning condition to this effect should be attached to any Planning Permission granted.

18. LOSS OF AMENITY INCLUDING THE PODIUM

The proposed outside area is extremely limited for a building with such dense occupancy. This will mean that residents and others will undoubtedly spill out into the street (as happens at the Jugged Hare where they are all over the pavement and road drinking and smoking and sometimes taking drugs) **and also onto the Podium** at all hours of the day and night. The Podium was and is intended to be a quiet and restful place.

It appears that there will potentially be up to 348 additional residents in 45 Beech Street (see point 11 above). Presumably all of them will need to register at the Neaman Practice as a doctor's surgery. Can this be achieved without adversely affecting the health and wellbeing of the often quite elderly people already resident in the locality?

19. POLLUTION

The Barbican Tunnel is already a polluted area. Using this as the main access to 45 Beech Street will have potential adverse health risks to the proposed occupants. They will almost certainly be of a younger age group (this is the target group of the developers) and it must be a bad idea to cause damage to health of this demographic – let alone any age group.

SUMMARY TO OBJECTION TO THE APPLICATION

We are not objecting to residential accommodation in 45 Beech Street per se. We acknowledge that such accommodation is needed so this is not just our trying to look after our own interests.

However, in practice, far from being a simple change of use, this permission in its existing form could be a disaster for the area – affecting Ben Jonson House and a significant number of adjoining premises for the reasons set out above. Very little thought seems to have been given by the developers to consider the interests of either Barbican residents or those of other neighbouring buildings either during the construction or during the Building's operation.

The Planning Statement states that the Application pays "particular regard to the immediate surroundings, the local context and notably the setting which in this case relates most pertinently to key designated assets". This is a reference to the Design of the Development. However, for the reasons stated above, we do not think this principle has been adhered to adequately overall in this Planning Application.

Accordingly, the proposal should not go forward without significant further amendment – if at all. For these reasons we roundly **OBJECT** to it and ask that it be rejected in its existing form without serious further consideration and amendment for the reasons set out above. Some of the Objections mentioned could be resolved by Planning Conditions in any Planning Permission granted but sufficient details have not been given in the Draft Management Plan.

Ben Jonson House Group Committee

Sent on behalf of the Committee by:

Stephen Chapman
Treasurer
304 Ben Jonson House
Barbican
London
EC2Y 8NQ

ENDS

**Objections of STEPHEN CHAPMAN to the Planning Permission Application for 45 Beech Street
London EC2Y 8AD**

FOR THE ATTENTION OF THE CASE OFFICER SAMUEL JAMES

YOUR REF: 24/00176/FULL

My objections to the Planning Permission Application are more or less the same as those submitted by the Ben Jonson House Group Committee as I have a flat at the western end of Ben Jonson House which is the part most adversely affected by the Application. Accordingly, my objections follow almost verbatim the House Group's comments but slightly amended to cover my personal outlook and my interest in considering the needs of the Barbican Residential Estate generally where I have lived since 2002.

While accepting that residential accommodation is needed in the City of London, the proposal for 45 Beech Street will cause a change in the character of the existing quiet residential neighbourhood which a planning permission of this type should not do and is completely unsuitable to the surrounding area in its existing form. Accordingly, I **OBJECT** to the proposals in the **Planning Application 24/00176/FULL** for the following reasons:

1. HEIGHT/MASS/LOSS OF LIGHT AND DAYLIGHT

The proposed new building will fill in the space between Bridgewater House to the north and the existing Building to the south. The height will be increased by a considerable amount for its entire length to a height greatly in excess of the apex of Bridgewater House – itself already a high (but fortunately narrow) building and completely changing the surrounding area. This is instead of the reducing height of the existing building as it goes northwards which allows light to adjoining buildings.

This additional height is extreme in the context of surrounding buildings and will cause a significant loss of light not only to Ben Jonson House (BJH in this section) including the Flat where I live but also other buildings.

Specifically as regards BJH, there will be a significant loss of light (both sunlight and light generally) to the flats at the rear of BJH (including mine) and especially to the three flats at levels 2, 3 and 5 on the western end of BJH with windows directly onto Bridgewater Street.

Bridgewater Street will become something approaching a chasm as 45 Beech Street is extremely close to BJH and the additional height will make the road tunnel-like.

Adding it to the proposed significant additional height of Cripplegate House 1 Golden Lane which is currently in the course of construction - having been given permission in late 2022 - this will adversely affect Ben Jonson House including my Flat. We have not yet seen in practice what the effect of this will be to light to Ben Jonson House and in the area generally, but it will undoubtedly be significant to a negative degree and the additional proposals for 45 Beech Street will aggravate this markedly.

Overall, this proposed development will give significant additional massing and the confluence of planning permissions will together potentially create an adverse effect on BJH, the Cobalt Building and the area generally.

The Anstey Horne Daylight and Sunlight Proposed Accommodation Report dated 26 January 2024 seems sparing in its support for the proposal. The loss of light including to my Flat will quite clearly be significant.

2. DESIGN OF THE PROPOSED NEW BUILDING

I agree with the statement in the House Group's comment namely that the copying of the barrel-vaulted roof motif feels like an inappropriate pastiche of the original Barbican estate. A contrasting design may have been more successful. This is clearly evidenced by the wide barrel-vaulted roofs along the southern elevation of the proposed development, which appear too large and heavy by comparison. Instead, in architectural terms, they should have been smaller and subservient to those of the neighbouring Grade II listed Ben Jonson House, John Trundle Court, Bunyan Court and Bryer Court. In this instance, the copy building rather overpowers the original.

3. TERRACE AT LEVEL 9 AT THE REAR

The proposed large open air terrace at 9th floor level approximately 26 feet (8 metres) square to the rear of the Building where it abuts Bridgewater House will cause noise and disturbance. Parties have occurred on a very rare basis (the last was over two years ago) on the terrace on the top floor of the Cobalt Building going into the early morning and they are extraordinarily disturbing. Effectively, it is impossible to sleep.

The new terrace at 45 Beech Street will be at more or less the same height and will be used constantly and presumably for socialising and partying. This will specifically have a potential adverse effect on all flats on the north and west ends of Ben Jonson House (including to mine), to Cobalt Building and to Bridgewater House causing noise and disturbance.

From the drawings, the balustrade overlooking Bridgewater Street is not high enough to shield people and create a sound barrier. It clearly shows people able to look over it which will create even more potential noise and disturbance. As this area is so quiet generally, even a low amount of noise will have a very disturbing effect.

Please see point 10 below as to limitations of hours of use of this area.

4. FIVE BALCONIES AT LEVEL 8

The five terraces at Level 8 which will be on the south face of 45 Beech Street will, together with the opening windows of the flats along Bridgewater Street and the Terrace at Level 9, cause noise and disturbance around the whole of the south and east faces of 45 Beech Street to flats on the west and southern faces of Ben Jonson House as well as to the flats on the north side of Ben Jonson House (including mine).

As most of the flats in Ben Jonson House (including mine) face both south and north, they and I will experience the noise and disturbance from both directions. As these flats are quite small, there will be no area to escape to – except to leave the flat entirely.

As stated above, in light of the concrete nature of the surrounding buildings and quiet area generally, even low noise late at night is disturbing.

5. OUTSIDE COURTYARD AREA AT BASEMENT AREA BUT OPEN ALL THE WAY UP THE BUILDING

Being adjacent to Bridgewater House, Ben Jonson House and Cobalt House, this area will be used for socialising and presumably partying. The potential for noise and disturbance is obvious.

6. CAFÉ 24/7 ALSO OPEN TO THE PUBLIC WITH OPENABLE WINDOWS TO BRIDGEWATER STREET

The barista café/lounge will be open to residents “24/7”. It will also be open to the public 7am-5pm which will mean a further addition of people going to the Building starting very early. As the windows are openable onto Bridgewater Street, this means that potentially there will be noise and disturbance 24/7.

7. COMMUNAL KITCHENS WITH OPENABLE WINDOWS TO BRIDGEWATER STREET

There will be a communal kitchen potentially used by up to 348 residents (see point 11 below) and presumably management and support staff. The kitchen has three full width openable windows opening directly onto Bridgewater Street (which is adjacent to my Flat) and possibly also onto Beech Street (the plans are not clear). This will inevitably cause noise and disturbance from early in the morning 7 days a week ie including Sundays which will be audible from my Flat.

8. OPENABLE WINDOWS IN ALL FLATS 79 OF WHICH ABUT BRIDGEWATER STREET ALONE

All 174 flats have openable windows we were advised by the developers and this is clear from the plans. This will cause inevitable noise and disturbance to all areas on the north, south, east and west boundaries of 45 Beech Street including the Podium (which is to be enjoyed by the public). There are 79 flats facing Bridgewater Street alone. This will specifically adversely affect Ben Jonson House which abuts Bridgewater Street including my Flat which looks onto Bridgewater Street. In addition to people talking and smoking, there will also be the possibility of music and even cooking smells from the internal kitchenettes.

9. NOISE GENERALLY IN THE BARBICAN AREA

Newcomers to the area do not realise how much sound reverberates around the Barbican because of its concrete construction. And also because it is a constitutionally quiet area despite having a large number of residences. Even a single voice can be disturbing at night.

10. LIMITATION ON HOURS OF USE OF OPEN SPACES

The planning permission for 1 Golden Lane has included a condition limiting use of the roof terraces and outside areas from 9 am to 6 pm to protect surrounding premises. A similar condition should be imposed on use of all outside areas including those parts of 45 Beech Street referred to at points 3 to 6 above as this remains a commercial building and will not be just a block of flats.

11. INTENSITY OF PROPOSED USE OF 45 BEECH STREET

Currently the building is used as offices in a quiet residential area and has given no problem from the user point of view. Most of the time you would hardly know it is there.

The proposal is for a premises supposedly small studio “private rooms” but in practice something more like a hotel/conference centre/hall of residence presumably for young people - with 174 bedrooms with double beds and communal living and facilities including live music.

Nothing is said in the Draft Management Plan about limiting numbers in each studio private room which gives the potential for **348** residents in the building at any one time together with all management and staff and visitors. Nothing is said in the Draft Management Plan about single occupancy and In today’s world, one must expect that a good number of the intended occupants will have partners with whom they may wish to share the bedrooms. It seems hard to believe that partners will not be allowed in the rooms and this is certainly not stated in the Draft Management Plan. The building will be used 24 hours a day 365 days a year and there will be constant hubbub generally much greater than in a simple block of flats.

It will be suitable for a younger demographic who are more inclined to socialise and make additional noise to older demographics (this is not a criticism). Potentially it will create a buzzing atmosphere around the building with constant movement all hours of the day and night. A complete change from the quiet atmosphere at present.

Terms and provisions of any leases or tenancy agreements are not specified in the Draft Management Plan except that they may be not less than one month’s duration. So they could be anything. These ought to be made clear and suitable and contained as Planning Conditions in any Planning Permission which may be granted.

12. CO-WORKING HUB

This space will also be open to the public if they purchase a membership and are just inside the entrance lobby to the building. This will mean further additional footfall to the premises.

This hub **along with the Café** will be set on either side of the entrance lobby to the building. This publicly accessible area will host weekly events including **live music**, educational talks as well as flexible everyday working stations and areas for a range of social interaction.

These areas will be open to the public and will include a recording studio.

It is obvious that when the front doors of 45 Beech Street are open (even if on an open and close basis) noise will filtrate outwards to the surrounding area causing yet more noise and disturbance. All this will be audible from my Flat.

It should be remembered that there are many similar services already available in the Barbican itself and the costs of same need to be recovered.

13. LIVE MUSIC/RECORDING

The reference to live music and recording in the Co-Working Hub is of especial concern. Any areas used for live music or recording should have sound proofing and also limited to certain hours of use so as not to create noise and disturbance for surrounding residents including specifically Ben Jonson House which abuts 45 Beech Street and includes my Flat. This was done for the cinemas at the other end of the Barbican Tunnel and that should be repeated here.

14. EVENTS

The owner will curate events within the Building including presumably some of the outside spaces to include supper clubs, workshops, guest speakers, performances, art exhibitions, pop-ups, fitness classes and community inspired projects. It will also facilitate its residents to run their own events and programmes.

Again this will cause additional footfall to the premises with concomitant noise and disturbance. No effort is shown in the Draft Management Plan to protect (or even consider) the requirements of residents living in the immediate vicinity.

15. NO NOISE ASSESSMENT RELATING TO EFFECT ON SURROUNDING BUILDINGS AND AREAS

The Noise and Vibration Impact Assessment Report forming part of the Application is a long technical document that gives attention to the needs of the occupants of 45 Beech Street but very little (if anything) about the Development's effect on surrounding buildings. Accordingly there is an absence of a proper Noise Assessment on surrounding buildings and areas and no evidence that this has been given proper consideration.

The conclusion of the Report also admits that a "suitably worded planning condition may be applied to cover building services plant noise emissions, on the basis that the final design proposals have not yet been developed". So this element of the design has not yet been done. Personally I am most concerned at this.

16. EXTRACTION - FANS AND SMELLS

All extraction from food smells should be Inside the building and concealed in accordance with City of London Local Plans. This is not properly addressed in the supporting documentation with the Planning Application.

The same Restrictions as for restaurants in the area like Cote at the end of the Barbican Tunnel must be adhered to. Although now dealt with in the main, residents in surrounding flats

suffered significantly for a long time from restaurant/extraction smells from Cote and this should not be repeated. Having on the odd occasion had problems with restaurant smells, I know how disruptive they can be.

17. SERVICES AND SERVICING

Providing all the services to this proposed intensely used building with multiple uses will mean a significant number of deliveries causing further noise and disturbance. Most of them will have to be in Bridgewater Street (abutting Ben Jonson House and my Flat) as there is nowhere else for them to be other than Beech Street itself which will not be possible because it is a thoroughfare. There will be serious interruption to traffic flow, increased pollution, dustcarts, noise and disturbance and worse if Bridgewater Street is closed at its junction with Beech Street as has often been the case and is mooted from time to time by the Corporation of London. All this must be added to the increased servicing for Cripplegate House 1 Golden Lane in this area which will cause noise and disturbance to those of us overlooking it.

As 45 Beech Street is so close to Ben Jonson House in Bridgewater Street, deliveries to 45 Beech Street should be limited as they are to Cote Restaurant at the end of the Beech Street Tunnel. This should be no earlier than 8.30 am on weekdays, 10 am on Saturdays and no deliveries on Sundays. A Planning condition to this effect should be attached to any Planning Permission granted.

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It appears that there will potentially be up to 348 additional residents in 45 Beech Street (see point 11 above). Presumably all of them will need to register at the Neaman Practice as a doctor's surgery. Can this be achieved without adversely affecting the health and wellbeing of the often quite elderly people already resident in the locality?

19. POLLUTION

The Barbican Tunnel is already a polluted area. Using this as the main access to 45 Beech Street will have potential adverse health risks to the proposed occupants. They will almost certainly be of a younger age group (this is the target group of the developers) and it must be a bad idea to cause damage to health of this demographic – let alone any age group.

SUMMARY TO OBJECTION TO THE APPLICATION

I am not objecting to residential accommodation in 45 Beech Street per se. I acknowledge that such accommodation is needed so this is not just my trying to look after my own interests. I think it is important to look after and consider the needs of the Barbican Estate as a whole and other buildings nearby which may be impacted.

However, in practice, far from being a simple change of use, this permission in its existing form could be a disaster for the area – affecting Ben Jonson House (including my Flat) and a significant number of adjoining premises for the reasons set out above. Very little thought seems to have been given by the developers to consider the interests of either Barbican residents or those of other neighbouring buildings either during the construction or during the Building’s operation.

The Planning Statement states that the Application pays “particular regard to the immediate surroundings, the local context and notably the setting which in this case relates most pertinently to key designated assets”. This is a reference to the Design of the Development. However, for the reasons stated above, I do not think this principle has been adhered to adequately overall in this Planning Application.

Accordingly, the proposal should not go forward without significant further amendment – if at all. For these reasons I completely **OBJECT** to it and ask that it be rejected in its existing form without serious further consideration and amendment for the reasons set out above. Some of the Objections mentioned could be resolved by Planning Conditions in any Planning Permission granted but sufficient details have not been given in the Draft Management Plan.

Stephen Chapman

304 Ben Jonson House
Barbican
London
EC2Y 8NQ

ENDS

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Mr Stephen Chapman

Address: Flat 304 Ben Jonson House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:As Treasurer of the Ben Jonson House Group Committee, I have submitted an Objection to the Planning Application for 45 Beech Street on behalf of Ben Jonson House to the Case Officer Sam James. It is too long to fit into the 2000 character limit so he will upload it as a Public Comment.

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Case Officer: Samuel James

Customer Details

Name: Mr Frank Boait

Address: 203 Ben Jonson House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I was extremely surprised to discover that there will be 174 dwellings in this building, together with a cafe that will be open to residents and members of the public. I understand that there will be a co-working hub, with regular events planned, including live music and the opportunity for residents to run their own events.

As a resident of Ben Jonson House, a block that is within 17 metres of this development, on the other side of Bridgewater Street (with Bryer Court even closer at 4 metres away), I was disappointed that the list of organisations that were consulted did not include the Ben Jonson House Group, a Registered Tenants' Association. My flat is the second-closest to this development and I am very concerned that it will be impacted by noise, especially in the evening. The proposed terraces, together with a street garden, will encourage noise late at night which has been a problem with Cripplegate House. Deliveries are likely to also cause a noise problem. If permission is given for this building, then times of access to the terraces, gardens and deliveries and collections should be carefully restricted (similar to those already in place for Cote, the restaurant at the other end of the building).

I note that the shared kitchen and the café / lounge are both next to Bridgewater Street and am concerned that smells will also impact my flat. There were problems with smells from Cote impacting residents of Ben Jonson House and it would be unhelpful if a similar problem was created at the other end of the House.

It is not clear whether the users of this building will be long term tenants, or if it will be used like a hotel. There is a risk that it will end up being like a university hall of residence.

Ben Jonson House is in an area of the Barbican that can and has been described as an "oasis of

calm". The number and type of occupants, together with the activities proposed and the open areas, makes me very concerned about the likelihood of noise nuisance.

Comments for Planning Application 24/00176/FULL

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Case Officer: Samuel James

Customer Details

Name: Ms Candace Gillies-Wright

Address: 342 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: My flat is almost directly above this proposed development. I know from experience that sounds rise on this estate. I am very seriously concerned that I will be forced to listen to the sound track from movie nights, party nights, and all the other large social gatherings intended for the new roof social area. This building is intended for short stay residents - I think one may fairly expect mostly students and other young transient people who will not care in the least about the long term residents nearby. There is a very high likelihood of anti social behaviour affecting the Barbican estate. The significant increase in the height of the building will inevitably cause both yet more shading nearby and yet more wind turbulence - both already major issues.

This development is too big and seems positively designed to be a bad neighbour. It is intended for transient people who will contribute little to the social fabric of the area and may contribute greatly to reducing quality of life for many permanent residents.

Comments for Planning Application 24/00176/FULL

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Case Officer: Samuel James

Customer Details

Name: Mr Scott Palmer

Address: Flat 102, Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: I don't object to most of the details. I strongly object to a communal terrace with plans to screen films etc. this would create a significant disruption to many residents in the Barbican whose bedrooms and living space could be directly viewed from the terrace, not to mention the noise from potentially hundreds of people. The top floors should be reserved as private single dwelling roof terraces,

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Case Officer: Samuel James

Customer Details

Name: Mr William Davy

Address: 21 breton house Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: We live on the third floor of Breton House facing West. For several months of the year our flat receives no sunlight. If the height of 45 Beech Street is increased as proposed we will receive even less. We therefore strongly object to this development.

Begum, Shupi

From: Gaby Robertshaw [REDACTED]
Sent: 03 April 2024 11:02
To: PLN - Comments
Cc: James, Samuel
Subject: Re: Comments for Planning Application 24/00176/FULL

THIS IS AN EXTERNAL EMAIL

Dear Planning Team

Please could you replace or update my neighbour comment for 45 Beech Street made on 1 April with the amended copy below:

When conditioning the application for 45 Beech (24/00176/FULL) could the Planners please give careful consideration to the **enforcement** of noise, vibration and dust measures for the demolition and rebuild alongside the City's strict working hours for this project.

If approved they would overlap with the Barbican Podium phase 2 works which are slated to commence in Summer 2025-2027 resulting in additional noise and dust issues as experienced with the transformation of Beech Gardens (2012-2015)

The conditions imposed on nearby 1 Golden Lane for similar works have not proved robust enough. (23/00084/MDC)

The plan to organise film shows and events on the **top floor** open air roof terrace would also provide excessive noise within our residential cluster.

Many thanks

Gaby Robertshaw
204 Crescent House EC1Y 0SL
[REDACTED]

On 1 Apr 2024, at 18:38, PLNComments@cityoflondon.gov.uk wrote:

Comments for Planning Application 24/00176/FULL

Dear Sir/Madam,

Gaby Robertshaw,

You have been sent this email because you or somebody else has submitted a comment on a Planning Application to your local authority using your email address. A summary of your comments is provided below.

Comments were submitted at 01/04/2024 6:38 PM from Gaby Robertshaw.

Application Summary

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

[Click for further information](#)

Customer Details

Name: Gaby Robertshaw

Email: [REDACTED]

Address: 204 Crescent House London EC1Y 0SL

Comments Details

Commenter Type: Neighbour

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

Reasons for comment: - Noise

Comments:

When conditioning the application for 45 Beech (24/00176/FULL) could the Planners please give careful consideration to the alleviation of noise, vibration and dust measures for the demolition and rebuild alongside the City's strict working hours for this project.

If approved they would overlap with the Barbican Podium phase 2 works which are slated to commence in Summer 2025-2027 resulting in additional noise and dust issues as experienced with the transformation of Beech Gardens (2012-2015)

The conditions imposed on nearby 1 Golden Lane for similar works have not proved robust enough. (23/00084/MDC)

Use of the 12th floor open air roof terrace for film shows and events would provide excessive noise within our residential cluster. These would be better arranged undercover.

Kind regards

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Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Case Officer: Samuel James

Customer Details

Name: Mrs Sandra Fryer

Address: 705 Bryer Court London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: We object to this application for high density co-living accommodation. Our reason for objections are as follows

- The scheme is poorly designed and insensitive to the Barbican estate listed building, conservation area and heritage setting, in particular the pastiche barrel rooves are unacceptable, not only because of their dimensions, but also since on the most precious south elevation, the barrels do not align with the building pattern and fenestration on the lower floors
- The building is too large, too high, one storey should be removed to ensure the building is subsidiary to the power blocks on either side. The scale and massing is too large for this infill site
- A much more simple, elegant design is required
- We object to co-living, since there is no proven need for short term accommodation, rather the area and London as a whole needs permanent housing of a mixed type and tenure including affordable homes.
- The tiny studios, the inadequate cooking facilities, and the general overcrowding suggest a short-term housing idea, not long-term decent homes
- We object to suggested informal use of the courtyard, the noise already bounces right up through the space, and risks being a nuisance to existing residents,
- There would also be significant overlooking from all sides of this development including by the residents of Bryer Court
- There is an urgent need to local community space, space accessible local residents, this scheme give nothing back to the local area or community.

Overall, we feel that this is a scheme seeking to maximise financial return rather than design a successful and appropriate scheme for this very sensitive setting, this scheme brings little to the area, and therefore we hope that this will be refused. We do not think that co-living is the right solution for this site.

We hope you will consider all the objections raised and refuse this planning application.

From: [James, Samuel](#)
To: [PLN - Comments](#)
Subject: Fw: 24/00176/FULL 45 Beech Street
Date: 06 June 2024 17:16:05
Attachments: [image002.png](#)

From: Nancollas, Tom [REDACTED]
Sent: 06 June 2024 17:14
To: [REDACTED]
Subject: FW: 24/00176/FULL 45 Beech Street

Fyi below!



Tom Nancollas | Assistant Director (Design)
Environment Department | City of London | Guildhall | London EC2V 7HH
[REDACTED]
[REDACTED]
[REDACTED] | www.cityoflondon.gov.uk



From: Fred Rodgers [REDACTED]
Sent: Thursday, June 6, 2024 4:00 PM
To: Nancollas, Tom [REDACTED]
Subject: 24/00176/FULL 45 Beech Street

THIS IS AN EXTERNAL EMAIL

Dear Mr Nancollas,

From our recent meeting, it's clear that we don't agree on the design of the proposed roof for 45 Beech Street. Unfortunately, in the absence of a design review panel, as recommended by D4D of the London Plan 2021, your opinion will prevail.

However, the unnecessary additional embodied carbon in the proposed roof, as opposed to a flat one, as well as other sustainability issues needs to be addressed. If

the Climate Action Strategy has any relevance, the proposed roof must be rejected.

Reverting to design, I agree that the originally proposed roof was horrendous - AHMM seem to have a problem with roofs, as can be seen at Clarendon Court per the attached. However, the floor to floor heights of its two top floors - 3 metres - are the same as the floor to floor height of the proposed floor 8 of 45 Beech Street but, of course, not as high as the top floor.

A flat roof, instead of an arched roof, would not only be lighter and would reduce embedded carbon emissions and solar glare. It would also enhance sustainability, including through a reduced heating need and providing space for more photovoltaic panels.

Although ugly in black, the Clarendon Court roof shows that an alternative treatment is feasible. For 45, Beech Street, it must be more sustainable. Using cross-laminated timber and/or structural engineered bamboo, even, especially unpainted, would achieve that requirement.

Were the roof to be lower, residents in both Bridgewater House, Bryer Court, Cobalt Building and Ben Jonson House would have a lower loss of sunlight. The western side of Breton House already suffers a loss of afternoon/ evening sunlight - and heat - from the additional height of Clarendon Court over Bernard Morgan House while awaiting a similar fate from 1 Golden Lane.

The above evidence confirms that extra floors have a significant effect on residential amenity. I'm sorry but recommending unnecessary aggravation of that effect; an unnecessary increase in embodied carbon emissions; and losing out on sustainability enhancement is simply incomprehensible.

Finally, please treat the above as an objection to application 24/00176/FULL and arrange for it to be posted to the planning portal. Many thanks.

Best regards,

Fred Rodgers

100 Breton House
Barbican
London
EC2Y 8PQ
UK





Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works. Please note this is a re-consultation following the submission of amendments comprising the following: |cr|- Addition of an accessible car parking space within the courtyard; and |cr|- Addition of a flue to the courtyard elevation, serving an emergency generator

Case Officer: Samuel James

Customer Details

Name: Mr Roy Sully

Address: 253 Shakespeare Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment:I can see the logic of the conversion to some sort of residential use but am concerned at noise pollution from the outdoor terrace which will form a potential nuisance to residents in the Shakespeare Tower.

Noise travels upwards as well as sideways .It needs to be contained within the building and an outdoor terrace will not achieve that.

I am also concerned about vehicle access. The nature of the scheme will mean people checking in and checking out, probably on a daily basis as we are talking about short lets. Is there enough provision for vans etc which people will use to do that? If not we are going to have vehicles blocking Bridgewater Street if, for example, a couple of people move in and out on the same day, which is quite likely with 174 dwellings.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

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Case Officer: Samuel James

Customer Details

Name: Miss Frances Northall

Address: 702 Bryer Court Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: My flat is on top floor of Bryer Court, we currently have an open walkway giving a full view across to Breton Court. The height of the proposed building will have an adverse impact on view, light and privacy. I am very concerned about and opposed to the potential for noise from the proposed outdoor space; this seems very inappropriate and inconsiderate considering its position in the middle of a residential area.

From: [REDACTED]
To: [REDACTED]
Subject: 45 Beech Street EC2Y 8AD. 24/00176/FULL
Date: 12 August 2024 16:49:22

You don't often get email from [REDACTED] [Learn why this is important](#)

THIS IS AN EXTERNAL EMAIL

I am writing to condemn the proposals for 45 Beech street. The conversion of offices into a hostel with single studio flats will mean that there will be a large number of people living in small spaces in a quiet residential area in the City of London. This is not the place for temporary accommodation for people who will be renting the properties. I appreciate that accommodation is needed but this area is not suitable for hostel type of living.

Building further storeys will remove the light from our flat and most of the others in the front of the Cobalt Building making them less pleasant to live in.

We are already having to put up with the terrible noise from 1 Golden Lane development and further disruption will be intolerable.

A cafe in the ground floor is not required either - there is a plethora of eating and cafes round here.

Please consider this request and stop the application.

Yours

M H Gadsden

Flat 10 Cobalt Building, Bridgewater Square, EC2Y 8AH

From: [REDACTED]
To: [REDACTED]
Subject: 45 Beech Street
Date: 13 August 2024 09:42:58

You don't often get email from [REDACTED] [Learn why this is important](#)

THIS IS AN EXTERNAL EMAIL

Dear City of London

I live at Flat 10, The Cobalt Building, Bridgewater Square, EC2Y 8AH and strongly object to the proposed height of the development of 45 Beech Street.

At the moment, our main view of the sky is that above the top of 45 Beech Street. We would lose almost all our view of the sky and our natural light if the development is permitted. You are welcome to come and see the existing situation.

I ask you not to allow the development.

Yours faithfully
Christopher Gadsden

Comments for Planning Application 24/00176/FULL

Application Summary

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Case Officer: Samuel James

Customer Details

Name: Mrs Helen Clifford

Address: 15 Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:Noise

The temporary nature of the accommodation means that residents won't be concerned about neighbours. There is a considerable risk of noise and disruption, particularly from open windows in each of the flats. I am also worried that the development plans to offer live music events to their residents.

A large outdoor terrace, approximately 26 feet (8 meters) square, is proposed on the 9th floor. Additional outdoor terraces are planned at the front, opposite Shakespeare Tower, along with a community garden at ground level. All of these terraces are within a few metres of bedrooms and youthful activity - to be expected - is going to keep neighbours awake.

Proximity to Ben Jonson House

I'm shocked that the City would allow the obliteration of quality of life for the poor flats looking out from the west end of Ben Jonson House. Any activity or noise is going to severely affect those residents. Have councillors visited the site to check this out?? Not only that but 45 Beech Street will be increased in height affecting existing light along both the north and west of Ben Jonson House.

Beech Street during the project

Where will the lorries park up because there is no way that they can turn into that side street. This means closing off Beech Street in the west to east direction for long periods. Is this seen as acceptable?

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

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Case Officer: Samuel James

Customer Details

Name: Mrs Sarah Mann

Address: 9 Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: The building faces onto our main bedroom and I object to its increased height which will look out of keeping with the listed Barbican estate and deprive neighbours in adjacent blocks of light and warmth of sunlight.

It is crucial that tenancies must be for a minimum of three months to ensure that this large-scale purpose-built shared living developments does not effectively operate as a hostel with all the disturbance that would bring. Similarly there should be a ban on keeping pets. The disturbance which arose from the old YMCA hostel (now Blake Tower) and the illegal Airbnb use of Barbican flats illustrate the risks of short term lets and the harm they cause to residents.

That said, the existing building is very ugly and a more elegant structure would (if residents' objections were met) be welcomed.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

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Case Officer: Samuel James

Customer Details

Name: Mr Philip Ellaway

Address: 16 Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: The building overlooks a densely populated residential area in which sound is carried and amplified disproportionately by the concrete and tile of Barbican buildings and walkways, and backs onto the bedrooms of most flats in Defoe House. Any external leisure or entertainment space will add to the noise pollution.

Comments for Planning Application 24/00176/FULL

Application Summary

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Case Officer: Samuel James

Customer Details

Name: Dr David North

Address: 301 Ben Jonson House, Barbican, London EC2Y 8NQ

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment:NOISE

We live on the west side of Ben Jonson House, with windows directly facing 45 Beech Street.

The proposal to create a large outdoor terrace on the 9th floor, together with other outdoor spaces, would create an unacceptable noise nuisance for Barbican residents, particularly those living close to the development. The proposal for live music, parties, films etc demonstrates that no consideration has been given to this risk.

HEIGHT AND MASS

The increase in height and size of the building would reduce sunlight for Barbican residents.

DESIGN

The proposal seeks to mimic aspects of Barbican design, but in a pastiche way. It would substantially detract from the aesthetic of the locality.

CONSTRUCTION PHASE

The redevelopment of Cripplegate House has led to an unacceptable nuisance to Barbican

residents from Mondays through to Saturdays. Proper safeguards would need to be put in place for 45 Beech Street to minimise noise and nuisance to neighbours during the construction phase.

Comments for Planning Application 24/00176/FULL

Application Summary

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Case Officer: Samuel James

Customer Details

Name: Ms Dulce Merritt

Address: 8 Bridgewater House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I object to the planned increased height, LIVE MUSIC, 9th floor terrace of 8 sq metres, + garden at street level. All of these amenities risk LOSS OF LIGHT and increased NOISE and annoyances to local residents.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

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Case Officer: Samuel James

Customer Details

Name: Mr Adrian Tanovic

Address: 153 Shakespeare Tower, Barbican, London EC2Y 8DR

Comment Details

Commenter Type: Neighbour

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

Comment Reasons:

- Other
- Residential Amenity

Comment:Not opposed to this redevelopment in principle, but the inclusion of a tall flue for emergency generator exhaust raises some concern.

By statute, emergency generators must be tested regularly -- monthly for one or two hours continuously. The top of the proposed flue is level with, and in close proximity to, surrounding residential flats such as in Ben Jonson House and Shakespeare Tower.

How will the fumes be ameliorated so as not to cause potential health issues?

Comments for Planning Application 24/00176/FULL

Application Summary

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Case Officer: Samuel James

Customer Details

Name: Dr Martin Farebrother

Address: 117 Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:1 Whilst it is good that the building is to repurposed, the reasons why it cannot be repurposed as offices are few - low ceilings and an internal wall. It is ironic that the need for more offices is pleaded by the City of London in approving other developments - in particular London Wall West, and the Undershaft Tower

2 The site is surrounded closely on 3 sides by the Barbican Estate and on the 4th is contiguous with a residential block (Bridgwater House). The site is close to Bryer Court and Ben Johnson House, and quite close to Shakespeare Tower and Defoe House, especially (for Defoe) at the western end.

3 The application makes much of the fact that the site is not listed or part of the Conservation Area. However it is so close to both that any building impacts the Barbican Estate appearance. I would agree that in many respects the proposal is an improvement on the appearance of that existing. However there is increased massing, creating a 'wall' effect from the end of Bryer Court along the south side of BenJohnson House. In addition the proposed 'barrel vault' imitations are larger than those on Ben Johnson House, which is quite wrong architecturally.

4 The use of the building must not be allowed to become very short lets (a 'hostel'), and minimum 3 month let period must be rigidly enforced

5 The greatest objection is to the proposed uses of the 9th floor terrace area, to include music. From the amenity point of view the building is part of the Barbican Estate and the same rules on music and parties should be applied as in the Estate, for instance for the Lakeside Terrace, the gardens and the podium. We are on the 7th (top) floor of Defoe House, with all the bedrooms in the block on the north (proposed development) side, and although further from the high (9th floor) terrace of the development, than some in Defoe and elsewhere, the threat of noise disturbance is very real

6 I do not think the Construction plan adequately deals with the access problems for lorries

I note that a request has been made to amend the planning application to the above premises.

Extensive objections have already been submitted in respect of the change of use application of the above premises and this still stand. No account appears to have been taken of the objections.

Of continuing concern is the proposal to raise significantly the height of the building, the scale of the intended development, the proposed number of residents, and the application for a music licence. This is a residential area and a building of this scale, introducing a large number of comparatively short term residents with no stake in the area, the likelihood of even occasional music events, all these factors will diminish the quality of the neighbourhood and severely affect the right to quiet enjoyment of the residents of neighbouring properties.

The addition of an emergency generator could create additional noise and affect the air quality.

Regards

Helena Twist
501 Ben Jonson House Barbican EC2Y 8NH

Sent from my iPad

Comments for Planning Application 24/00176/FULL

Application Summary

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Case Officer: Samuel James

Customer Details

Name: Dr Harf Zatschler

Address: Flat 6, 6-9 Bridewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: The proposed development has a negative effect on my home, including loss of light, increasing noise and loss of privacy:

- The proposed increase in height of the building would reduce the amount of sunlight.
- Outside entertainment and recreation areas would invite amplified music to be put on, which would then echo throughout the inner courtyard that lies between the development and Bridewater House.
- The large number of windows facing the inner courtyard would directly overlook two of my bedrooms.

Comments for Planning Application 24/00176/FULL

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Case Officer: Samuel James

Customer Details

Name: Mr Dean Wybrow

Address: flat 4 The Cobalt Building 10-15 Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment:I and my partner live on the ground floor of the Cobalt Building. I guess the nearest point of our flat to 45 Beech Street measures approximately 12 meters.

Our chief but not only concern around this application is the noise impact. We share the views of other residents about the likely effect of an external amenity space. There should also be enforceable conditions for residents in the new building, the sort of restrictions which are routine for leaseholders in relation to playing music, audible activities, etc., during the night. We would urge that all reasonable sound insulation measures are imposed to minimise the noise pollution for neighbouring residents.

Living close to what would be the cooking facilities, I would ask that there are stringent conditions on ventilation and noise coming from any air units.

Comments for Planning Application 24/00176/FULL

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Case Officer: Samuel James

Customer Details

Name: Dr Gina Barnes

Address: Flat 9 Bridgewater House Bridgewater Square London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I wish to object to the up to 55% reduction of sunlight (factor of former value = 45%, page 42) to Flat 9, 3rd floor, Bridgewater House. We all have a right to daylight, particularly sunlight, and if permission is granted I will be pursuing right to light claims for re-design/ injunction. Your labeling of the rooms in a 3-bed apartment as all 'bedrooms' is misleading; not all rooms are used as bedrooms. We have two studies for our work at home, where daylight is a crucial factor. Thank you for taking these objections into consideration.

Comments for Planning Application 24/00176/FULL

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Case Officer: Samuel James

Customer Details

Name: Mr Gary Mclean

Address: Flat 97, Defoe House Barbican LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: The adjacent residential buildings have a strictly enforced set of rules on minimising noise pollution to our neighbours. Without similarly enforced rules I am concerned about the potential noise pollution from the proposed development's 9th floor terrace and from open windows. To minimise the potential for upset neighbours can we please have a similar set of noise pollution rules for the block, and for a minimum rental period of 12 months.

Comments for Planning Application 24/00176/FULL

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Case Officer: Samuel James

Customer Details

Name: Dr Garth Leder

Address: 85 Defoe House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: The external communal terrace with live music and the short-term nature of the lets are both completely inappropriate next door to residential buildings. This development would cause perpetual, severe noise nuisance to hundreds of Barbican flats. Please don't do this to us.

Comments for Planning Application 24/00176/FULL

Application Summary

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Case Officer: Samuel James

Customer Details

Name: Dr Benjamin Mohamed

Address: 88 Defoe House 88 Defoe House, Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: My bedroom faces 45 Beech St. I

would object to evening noise that can be heard. I need to sleep early -10:30pm latest. Can we please guarantee quiet residential area?

Comments for Planning Application 24/00176/FULL

Application Summary

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Case Officer: Samuel James

Customer Details

Name: Mr Frank Smith

Address: 18 Bridgewater House 6-9 Bridgewater Square London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:I own the above address jointly with my wife, Sue Budden We wish to object to this application on the grounds of a reduction in daylight and sunlight currently enjoyed by our flat. We are aware that we have a right to light and that if permission is granted we would be pursuing a right to light claims for re-design/injunction.

Objections to the Planning Permission Application for 45 Beech Street London EC2Y 8AD (2)

FOR THE ATTENTION OF THE CASE OFFICER SAMUEL JAMES

YOUR REF: 24/00176/FULL

This e mail is from the Ben Jonson House Group Committee on behalf of Ben Jonson House

We have seen the revised application for 45 Beech Street and note that **NONE** of the entirely legitimate comments we made in our first Representation that was published on your site on 29 March 2024 (the First BJH Representation) have been addressed. Nor indeed, so far as we can see, have the observations and objections from anyone else.

Accordingly, we **continue to OBJECT** to the proposals in the Planning Application **24/00176/FULL** as follows:

1. We repeat in their entirety the points made in the First BJH Representation all of which continue to apply and continue to give great concern to residents of Ben Jonson House (BJH). We ask that all the points be reconsidered and that planning permission is not issued until they have been resolved satisfactorily. The proposed development has the potential to have an extremely deleterious effect on the existing quiet nature of the neighbourhood.

It is stated in the application that the proposals are designed to be “integrated into their surroundings”. However, in their current state, this does not seem to be ensured in the least.

We have the following additional points:

2. HEIGHT OF PROPOSED BUILDING

The height of the proposed new building especially to the north end is extreme in the context of surrounding buildings and we ask that this be reconsidered and maybe even the two northernmost sets of windows be reduced. The loss of light specifically to all windows on the north side of Ben Jonson House but also across the whole area to the north and east will be significant in its proposed form.

3. SMOKING AND SMOKING AREAS

There is no indication from the plans that there are any areas inside the building for people to smoke. We are very concerned that the potentially high numbers who will be in the buildings and using the café and other facilities will congregate outside as they do at the Jugged Hare and spill onto the pavement. Also if they go to the Podium that will cause further noise and nuisance to neighbouring residents.

We have experienced a great deal of noise, disturbance and smoke (including smoke from drugs) from people on the Podium this year smoking under residents’ windows and are extremely concerned that residents from 45 Beech Street will just use the Podium and the street as an additional smoking and congregating area.

You state that you will police the building but the Management Plan is very short on detail as to how the owners are going to do this. This should be specified.

4. NUMBERS IN ROOMS

The application states that the rooms are single occupation only. However, there is no indication as to how this is to be managed. Is it really to be believed that none of the residents will have partners/girlfriends/boyfriends etc who will also expect to be able to sleep there?

The adjoining building Ben Jonson House has a large number of its 204 flats - which are significantly larger and often on two levels - limited by their Leases to being "in the occupation of one individual only and his or her immediate family" and limited to a maximum of two occupants only. The intensity of occupation of 45 Beech Street is causing considerable concern among residents.

5. PLANNING CONDITIONS

A number of elements in any planning permission granted should be secured by specific enforceable planning conditions.

SUMMARY TO OBJECTION TO THE APPLICATION

As we have already stated, we are not objecting to residential accommodation in 45 Beech Street per se. We acknowledge that such accommodation is needed so this is not just our trying to look after our own interests.

However, in practice, far from being a simple change of use, this permission in its existing form could be a disaster for the area – affecting Ben Jonson House and a significant number of adjoining premises for the reasons set out above and in the First BJH Representation. Very little thought seems to have been given by the developers to consider the interests of either Barbican residents or those of other neighbouring buildings either during the construction or during the Building's operation.

The Planning Statement states that the Application pays "particular regard to the immediate surroundings, the local context and notably the setting which in this case relates most pertinently to key designated assets". This is a reference to the Design of the Development. However, for the reasons stated above, we do not think this principle has been adhered to adequately overall in this Planning Application.

Accordingly, the proposal should not go forward without significant further amendment – if at all. For these reasons we roundly **OBJECT** to it and ask that it be rejected in its existing form without serious further consideration and amendment for the reasons set out above. Some of the Objections mentioned could be resolved by Planning Conditions in any Planning Permission granted but sufficient details have not been given in the Draft Management Plan.

Ben Jonson House Group Committee

Sent on behalf of the Committee by:

Stephen Chapman
Treasurer
304 Ben Jonson House
Barbican
London EC2Y 8NQ

ENDS

20.08.24

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works. Please note this is a re-consultation following the submission of amendments comprising the following: |cr|- Addition of an accessible car parking space within the courtyard; and |cr|- Addition of a flue to the courtyard elevation, serving an emergency generator

Case Officer: Samuel James

Customer Details

Name: Dr Jane Bickerton

Address: 207 Ben Jonson House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I am writing to confirm my previous objections to this planning application on the grounds of loss of residential amenity. I am a resident of Ben Jonson House affected potentially by this development both during the partial demolition of this property, construction of the new development and the subsequent disturbance to the Barbican by the future residents when completed.

I am particularly concerned by the impact of such a large number of new residents on the existing sewage system in this part of the Barbican.

Objections to the Planning Permission Application for 45 Beech Street London EC2Y 8AD (2)

FOR THE ATTENTION OF THE CASE OFFICER SAMUEL JAMES

YOUR REF: 24/00176/FULL

This e mail is from the Ben Jonson House Group Committee on behalf of Ben Jonson House

We have seen the revised application for 45 Beech Street and note that **NONE** of the entirely legitimate comments we made in our first Representation that was published on your site on 29 March 2024 (the First BJH Representation) have been addressed. Nor indeed, so far as we can see, have the observations and objections from anyone else.

Accordingly, we **continue to OBJECT** to the proposals in the Planning Application **24/00176/FULL** as follows:

1. We repeat in their entirety the points made in the First BJH Representation all of which continue to apply and continue to give great concern to residents of Ben Jonson House (BJH). We ask that all the points be reconsidered and that planning permission is not issued until they have been resolved satisfactorily. The proposed development has the potential to have an extremely deleterious effect on the existing quiet nature of the neighbourhood.

It is stated in the application that the proposals are designed to be “integrated into their surroundings”. However, in their current state, this does not seem to be ensured in the least.

We have the following additional points:

2. HEIGHT OF PROPOSED BUILDING

The height of the proposed new building especially to the north end is extreme in the context of surrounding buildings and we ask that this be reconsidered and maybe even the two northernmost sets of windows be reduced. The loss of light specifically to all windows on the north side of Ben Jonson House but also across the whole area to the north and east will be significant in its proposed form.

3. SMOKING AND SMOKING AREAS

There is no indication from the plans that there are any areas inside the building for people to smoke. We are very concerned that the potentially high numbers who will be in the buildings and using the café and other facilities will congregate outside as they do at the Jugged Hare and spill onto the pavement. Also if they go to the Podium that will cause further noise and nuisance to neighbouring residents.

We have experienced a great deal of noise, disturbance and smoke (including smoke from drugs) from people on the Podium this year smoking under residents’ windows and are extremely concerned that residents from 45 Beech Street will just use the Podium and the street as an additional smoking and congregating area.

You state that you will police the building but the Management Plan is very short on detail as to how the owners are going to do this. This should be specified.

4. NUMBERS IN ROOMS

The application states that the rooms are single occupation only. However, there is no indication as to how this is to be managed. Is it really to be believed that none of the residents will have partners/girlfriends/boyfriends etc who will also expect to be able to sleep there?

The adjoining building Ben Jonson House has a large number of its 204 flats - which are significantly larger and often on two levels - limited by their Leases to being "in the occupation of one individual only and his or her immediate family" and limited to a maximum of two occupants only. The intensity of occupation of 45 Beech Street is causing considerable concern among residents.

5. PLANNING CONDITIONS

A number of elements in any planning permission granted should be secured by specific enforceable planning conditions.

SUMMARY TO OBJECTION TO THE APPLICATION

As we have already stated, we are not objecting to residential accommodation in 45 Beech Street per se. We acknowledge that such accommodation is needed so this is not just our trying to look after our own interests.

However, in practice, far from being a simple change of use, this permission in its existing form could be a disaster for the area – affecting Ben Jonson House and a significant number of adjoining premises for the reasons set out above and in the First BJH Representation. Very little thought seems to have been given by the developers to consider the interests of either Barbican residents or those of other neighbouring buildings either during the construction or during the Building's operation.

The Planning Statement states that the Application pays "particular regard to the immediate surroundings, the local context and notably the setting which in this case relates most pertinently to key designated assets". This is a reference to the Design of the Development. However, for the reasons stated above, we do not think this principle has been adhered to adequately overall in this Planning Application.

Accordingly, the proposal should not go forward without significant further amendment – if at all. For these reasons we roundly **OBJECT** to it and ask that it be rejected in its existing form without serious further consideration and amendment for the reasons set out above. Some of the Objections mentioned could be resolved by Planning Conditions in any Planning Permission granted but sufficient details have not been given in the Draft Management Plan.

Ben Jonson House Group Committee

Sent on behalf of the Committee by:

Stephen Chapman
Treasurer
304 Ben Jonson House
Barbican
London EC2Y 8NQ

ENDS

20.08.24

**Objections of STEPHEN CHAPMAN to the Planning Permission Application for 45 Beech Street
London EC2Y 8AD (2)**

FOR THE ATTENTION OF THE CASE OFFICER SAMUEL JAMES

YOUR REF: 24/00176/FULL

My objections to the Planning Permission Application (2) are more or less the same as those submitted by the Ben Jonson House Group Committee as I have a flat at the western end of Ben Jonson House which is the part most adversely affected by the Application. Accordingly, my objections follow almost verbatim the House Group's comments but slightly amended to cover my personal outlook and my interest in considering the needs of the Barbican Residential Estate generally where I have lived since 2002.

I have seen the revised application for 45 Beech Street and note that **NONE** of the entirely legitimate comments made by me in my first Representation that was published on your site on 29 March 2024 (My First Representation) have been addressed. Nor indeed, so far as I can see, have the observations and objections from anyone else including those made by the Ben Jonson House Group Committee who wrote copiously on many points in the Application.

Accordingly, **I continue to OBJECT** to the proposals in the Planning Application **24/00176/FULL** as follows:

1. I repeat in their entirety the points I made in My First Representation all of which continue to apply and continue to give great concern both to me and residents of Ben Jonson House (BJH). I ask that all the points be reconsidered and that planning permission is not issued until they have been resolved satisfactorily. The proposed development has the potential to have an extremely deleterious effect on the existing quiet nature of the neighbourhood.

It is stated in the application that the proposals are designed to be "integrated into their surroundings". However, in their current state, this does not seem to be ensured in the least.

I have the following additional points:

2. HEIGHT OF PROPOSED BUILDING

The height of the proposed new building especially to the north end is extreme in the context of surrounding buildings and I ask that this be reconsidered and maybe even the two northernmost sets of windows be reduced which was mentioned as a possibility by the design team when I went to one of the original public exhibition at 45 Beech Street. The loss of light specifically to all windows on the north side of BJH but also across the whole area to the north and east will be significant in its proposed form not to just my dining room and bedroom but those of all flats on the west end of the north facing aspect of BJH.

3. SMOKING AND SMOKING AREAS

There is no indication from the plans that there are any areas inside the building for people to smoke. I am very concerned that the potentially high numbers who will be in the buildings and using the café and other facilities will congregate outside as they do at the Jugged Hare and spill onto the pavement. Also if they go to the Podium that will cause further noise and nuisance to neighbouring residents.

I/We have experienced a great deal of noise, disturbance and smoke (including smoke from drugs) from people on the Podium this year smoking under residents' windows and I am extremely concerned that residents from 45 Beech Street will just use the Podium and the street as an additional smoking and congregating area. It is supposed to be a peaceful place not one used by masses of young people from 45 Beech Street as a congregating place to make as much noise and create as much uncontrolled disturbance as they like. I am extremely concerned about this both for myself and for the remainder of BJH and other residents in surrounding buildings.

You state that you will police the building but the Management Plan is very short on detail as to how the owners are going to do this. This should be specified. Also I do not think that the Management Plan complies with the provisions of London Plan Policy H16 which are very specific.

4. NUMBERS IN ROOMS

The application states that the rooms are single occupation only. However, there is no indication as to how this is to be managed. Is it really to be believed that none of the residents will have partners/girlfriends/boyfriends etc who will also expect to be able to sleep there? It should be specified how this is to be assured.

The adjoining building Ben Jonson House has a large number of its 204 flats - which are significantly larger and often on two levels - limited by their Leases to being "in the occupation of one individual only and his or her immediate family" and limited to a maximum of two occupants only. If two independent people are not able to share one flat. The intensity of occupation of 45 Beech Street is causing considerable concern among residents.

5. PLANNING CONDITIONS

A number of elements in any planning permission granted should be secured by specific enforceable planning conditions.

SUMMARY TO OBJECTION TO THE APPLICATION

As I have already said, I am not objecting to residential accommodation in 45 Beech Street per se. I acknowledge that such accommodation is needed so this is not just my trying to look after my own interests. It is think it important to look after and consider the needs of the Barbican Estate as a whole and other buildings nearby which might be impacted.

However, in practice, far from being a simple change of use, this permission in its existing form could be a disaster for the area – affecting Ben Jonson House (including my Flat) and a significant number of adjoining premises for the reasons set out above and in My First Representation. Very little (if any) thought seems to have been given by the developers to consider the interests of either Barbican residents or those of other neighbouring buildings either during the construction or during the Building's operation.

The Planning Statement states that the Application pays "particular regard to the immediate surroundings, the local context and notably the setting which in this case relates most pertinently to

key designated assets". This is a reference to the Design of the Development. However, for the reasons stated above, I do not think this principle has been adhered to adequately overall in this Planning Application.

NOTE:

IT IS EXTREMELY CONCERNING THAT DESPITE THIS BEING A REVISED APPLICATION, NO ATTEMPT WHATSOEVER HAS BEEN MADE EVEN TO RESPOND TO ANY OF THE POINTS ALREADY MADE BY THE RESIDENTS OF NEIGHBOURING PROPERTIES DURING THE CONSULTATION PERIOD AFTER THE FIRST APPLICATION.

I AM FORCED TO WONDER WHETHER THE SO-CALLED CONSULTATION GRANTED BY THE CORPORATION OF LONDON IS IN FACT JUST A FORMALITY GRANTED AS REQUIRED PURSUANT TO LEGISLATION BUT OF NO OTHER VALUE OR RELEVANCE WHATSOEVER. I.E. THAT THE PLANNING DEPARTMENT OF THE CORPORATION OF LONDON MAKES NO ATTEMPT WHATSOEVER EVEN TO CONSIDER ANY OBJECTIONS MADE. WHICH OF COURSE IS A MATTER OF EXTRAORDINARY CONCERN.

Accordingly, the proposal should not go forward without significant further amendment – if at all. For these reasons I completely **OBJECT** to it and ask that it be rejected in its existing form without serious further consideration and amendment for the reasons set out above and in My First Representation. Some of the Objections mentioned could be resolved by Planning Conditions in any Planning Permission granted but sufficient details have not been given in the Draft Management Plan.

Stephen Chapman

304 Ben Jonson House

Barbican

London EC2Y 8NQ

20.08.24

ENDS

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works. Please note this is a re-consultation following the submission of amendments comprising the following: |cr|- Addition of an accessible car parking space within the courtyard; and |cr|- Addition of a flue to the courtyard elevation, serving an emergency generator

Case Officer: Samuel James

Customer Details

Name: Mr Kevin Wallace Rogers

Address: Defoe House Barbican Flat 87 LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: The development will significantly impact my own flat, mainly those flats in the middle of Defoe House. All of our bedrooms face north and directly onto No 45 Beech Street. The development does not factor major nuisance of noise to existing residents into the overall design.

While the general provision of good quality housing for local workers is desirable, the proposed re-development of 45 Beech Street will have additional storeys, meaning a loss of natural light to our flats, and for the upper floors the loss of the long view.

The proposed live music and the introduction of a large terrace on the 9th floor will be a nuisance to the residents with sound from the live music and the terraces feeding into the bedrooms of Defoe House. Given the present use is office, this change will have a very high impact on the existing residents. The opening windows of the flats also present a risk of noise and disturbance.

The additional height, with the change from office to housing, will regrettably result in a loss of privacy. Given the very tight site and its relationship to the Beech Street Tunnel, I would question

how the new flats will be adequately serviced. This, too, would generate traffic in the tunnel during otherwise quiet times and would mean further disturbance.

As the development is, it would have an overall negative impact on the area and the two existing listed residential estates,

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works. Please note this is a re-consultation following the submission of amendments comprising the following: |cr|- Addition of an accessible car parking space within the courtyard; and |cr|- Addition of a flue to the courtyard elevation, serving an emergency generator

Case Officer: Samuel James

Customer Details

Name: Mr Alex Castle

Address: 23 Shakespearw Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: The redevelopment of 45 Beech Street should not be permitted as proposed. Its proximity to Barbican residential buildings and its proposed use makes it unsuitable. The conversion to a large number of small single person residences with short-term tenants with no long-term stake in the Barbican and its environment is a bad outcome for the Barbican (a core asset of the City of London). There will be an increase in noise that will adversely affect Shakespeare Tower and Ben Johnson house. The open space and proposed terraces at the front will certainly lead to disturbance. The whole development is not in keeping with the Barbican and the property should be sympathetically developed as an office building.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works. Please note this is a re-consultation following the submission of amendments comprising the following: |cr|- Addition of an accessible car parking space within the courtyard; and |cr|- Addition of a flue to the courtyard elevation, serving an emergency generator

Case Officer: Samuel James

Customer Details

Name: Mr Pankaj Shah

Address: 36 Chandos Avenue Southgate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: We own a flat in 6-9 Bridgewater House. One bedroom faces the redevelopment at 45 Beech Street. We object to the redevelopment as in our view the addition of 2 new storeys to the building will affect our view from our bedroom and the quantity of light.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works. Please note this is a re-consultation following the submission of amendments comprising the following: |cr|- Addition of an accessible car parking space within the courtyard; and |cr|- Addition of a flue to the courtyard elevation, serving an emergency generator

Case Officer: Samuel James

Customer Details

Name: Mr Douglad Bevans

Address: 115 Defoe House Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: I am concerned that music in and out in the open space (7/8th floor?) will effectively be broadcast into our homes directly adjacent.

Is there any requirement on the developer in this respect?

The area is rather residential and I would like to see it keep this quieter character.

Comments for Planning Application 24/00176/FULL

Application Summary

Application Number: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works. Please note this is a re-consultation following the submission of amendments comprising the following: |cr|- Addition of an accessible car parking space within the courtyard; and |cr|- Addition of a flue to the courtyard elevation, serving an emergency generator

Case Officer: Samuel James

Customer Details

Name: Mrs Helen Hulson

Address: 523 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: The changes to this application do not address the objections raised previously and the timescale for responses, during a holiday period, is unfairly short.

I object to this development primarily because it is a completely unacceptable concentration of dwellings in a very restricted space, in close proximity to several residential buildings.

For comparison, 45, Beech Street proposes 174 dwellings, while Ben Jonson House contains 204 dwellings within a far greater footprint.

The fact that a 9th floor communal terrace is proposed, with facilities for live music, indicates the target residents for the development, who are less likely to prioritize maintaining the amenities of neighbouring residents.

The compact nature of the dwellings is likely to attract a large transient group of residents, with a lower commitment to the neighbourhood than more permanent residents. I am concerned that there will be a severe adverse impact on the right to quiet enjoyment of their properties by neighbouring residents.

In addition, the increase in height will negatively affect the level of sunlight and daylight to the homes of nearby residents.

I ask the Planning Committee to consider very seriously the effect of such a drastic change of use on existing neighbouring residents, who have co-existed peacefully with the current office use for very many years. Please do not approve this application.

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Agenda Item 5

Committee:	Date:
Planning Application Sub-Committee	10 th September 2024
Subject: City of London School for Girls, St Giles' Terrace, Barbican, London, EC2Y 8BB Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure	Public
Ward: Cripplegate	For Decision
Registered No: 23/01066/FULL and 23/00825/LBC	Registered on: 28 th July 2023 and 27 th September 2023
Conservation Area: Barbican and Golden Lane	Listed Building: Yes

Summary

The site comprises the City of London School for Girls, St. Giles Terrace, Barbican, EC2Y 8BB. The proposal comprises retrospective application for works comprising three fume cupboard discharge flues from the existing roof plant enclosure.

The works result in a degree of visual impact by introducing additional external flues but the proposals would not be overly intrusive and there would have a neutral impact on the Barbican Estate (II), Barbican Estate and Golden Lane Conservation Area and the Barbican Estate Registered Historic Park and Garden (II*). The Estate is robust and architecturally striking and of a scale, detailed design, materiality and complexity, which can absorb these further incidental interventions. The proposals are necessary additions to support the continued utility operations of the CLSG.

Subject to conditions it is not considered that the works would have an undue impact on residential amenity.

Overall, the proposals are considered to accord with the development plan. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

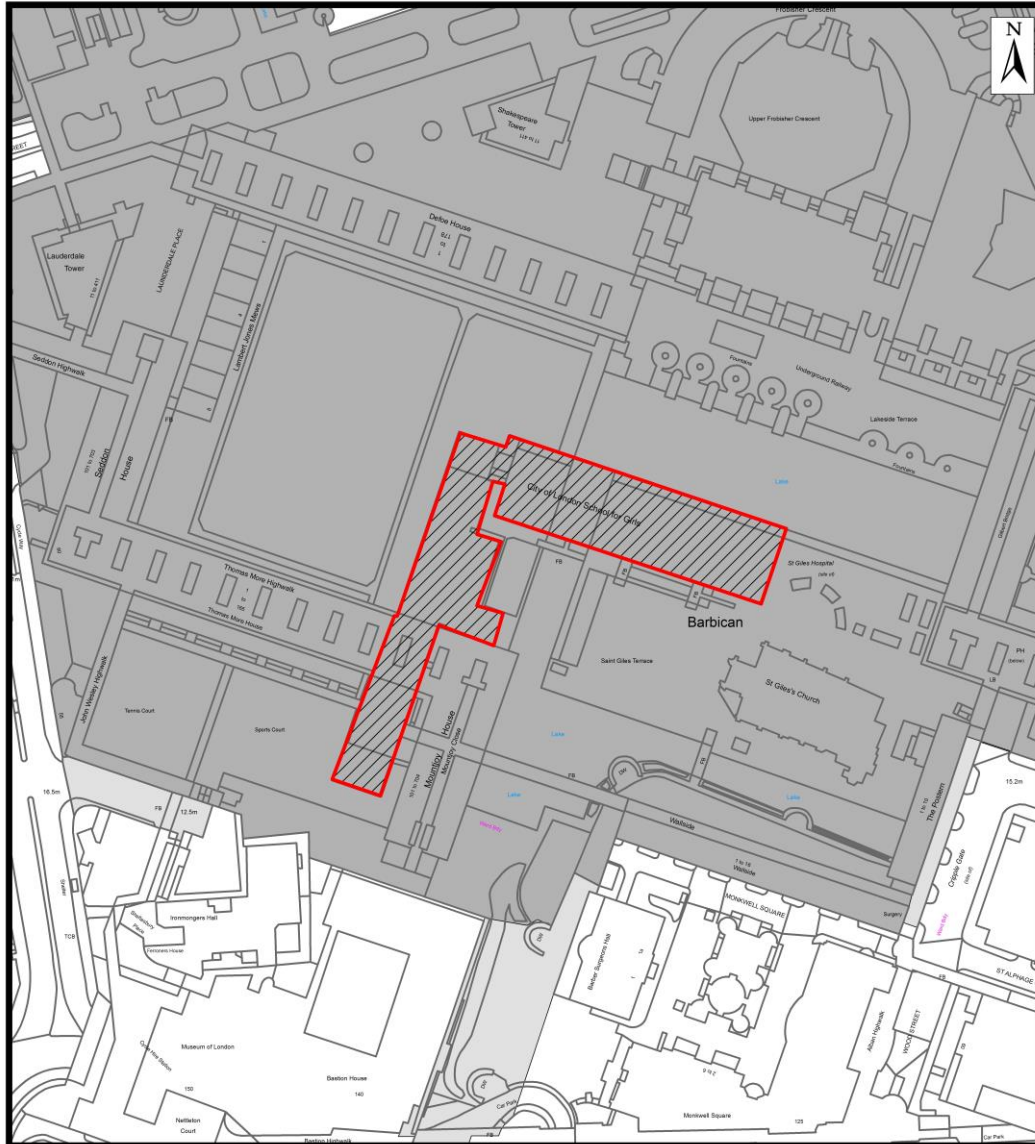
The Local Planning Authority ('LPA') must determine the application in accordance with the development plan unless other material consideration indicate otherwise. It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan, and the other material considerations which do not support the proposal.

Applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, it is considered that the proposed development complies with the development plan as a whole. Other material considerations also support the grant of planning permission. Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied.

Recommendation

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


Site Location Plan



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ADDRESS:
 City of London School for Girls
 St Giles' Terrace, Barbican

CASE No.
 23/01066/FULL

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



ENVIRONMENT DEPARTMENT

Main Report

Site and surrounding area

1. The Site is the City of London School for Girls, located in the Cripplesgate Ward within the Barbican Estate.
2. The Barbican Estate was designed by the architectural firm Chamberlin, Powell and Bon (CPB) and constructed between 1962 and 1982. The City of London School for Girls is integral to the architecture and the original ambitious masterplan vision part of the Barbican Estate. The school was among the first completed parts of the Barbican from 1965 onwards and has been the subject of various phases of development and refurbishment between 1975 and present.
3. The entirety of the Barbican Estate is designated as a Grade II listed building (2001) and is registered a Grade II* Registered Historic Park and Garden (2003). The Site is also located within the Barbican and Golden Lane Conservation Area (2019).

Planning History

4. Various planning applications have been made in respect of the City of London School for Girls and Barbican Estate but none are of relevance to the current proposal.

Background

5. The Level C Science classrooms within the City of London School of Girls have been recently refurbished, with the proposal for the new science classroom fume cupboards also requiring the installation of new flues to discharge any potentially contaminated air.
6. Previously, three extract ducts were installed on the roof plant room, two on the west elevation and one on the north elevation. The two flues on the western elevation featured vertical discharge stacks. The north elevation extract duct did not have a vertical discharge stack installed. The applicant has stated that in order to access the previously arranged flues, access to the plant room was via one small horizontal entrance into the plant room, which is also utilised by the extract ducts serving the science classrooms. When accessing the plant room space, maintenance workers would be required to use a transportable ladder placed against the edge of the entrance and work around the extract ducts.

7. The original Building Bulletin 88 'Fume Cupboards in Schools' has been replaced by CLEAPSS Guide G9 'Fume Cupboards in Schools', which provides guidance and specifications for the installation of fume cupboards in schools and colleges. The CLEAPSS Guide G9 document states that *'fumes should be discharged in a vertical direction at a minimum of 1 metre above the highest point of the building'*. This avoids the effects on fume cupboard performance of wind variations and eddies, e.g. at the edges of parapet roofs.
8. The CLEAPSS Guide G9 document goes on to say that the design and siting of the flues is important. If not installed correctly, contaminated air can re-enter the building via windows or ventilation inlets.
9. Subsequently, the applicant has carried out the installation of three new extract flues. The flues are installed on the north elevation of the roof plant room, and extend from their installation point to discharge one metre above the roof level. The extract flues are painted in a grey RAL 7004 to match the previous flues. The louvre is painted in a white RAL 9010 to match the existing.
10. In order to provide access to the roof plant room, a ladder which meets the requirements of Approved Document (K) has been installed which also necessitated the relocation of the extract ducts along the northern elevation.

Proposal

11. Planning permission and listed building consent is sought for the retrospective installation of the three fume cupboard extract flues to the existing roof plant enclosure. The works have already been carried out, and these applications were submitted following clarification as to what works required planning and listed building consent and which works would not. In this case, the latter comprises some internal works.

Amendments, Options and Justification

12. As originally submitted, the proposed works comprised three extract flues protruding from the northern elevation of the rooftop plant room and extending approximately 1,300mm above finished floor level. Following engagement with the project architect and agent, Cowan Architects, amendments to the proposal were submitted which reduced the height of the flues significantly to 700mm above finished floor level.
13. These amendments ensure that the proposed extracts terminate as low as possible while still meeting the relevant technical requirements. In addition, further information was submitted in the form of an updated Design and Access Statement and updated 3D modelling

information, providing detailed visual context, and summarising design limitations and access constraints.

14. A further consultation exercise was undertaken as a result, with no further objections or representations being received.

Consultations

15. As this is not a major planning application, the applicant is not required to provide a Statement of Community Involvement.
16. As part of the current application, the City of London Corporation acting as the Local Planning Authority ('LPA') has undertaken consultation with neighbouring residents in line with statutory duties.
17. Neighbour letters were sent to properties where views to the flues could be viewed from, namely Cromwell Tower, Defoe House, Lauderdale Tower, Thomas More House, Ben Jonson House, Lambert Jones Mews, Gilbert House and Seddon House. Site notices for both the planning and listed building consent applications were also posted in locations around the site. The applications were advertised via press notice and the 'weekly list'.
18. The application for planning permission was taken before the Conservation Area Advisory Committee who raised no objection.
19. Historic England and the Twentieth Century Society were also consulted. The Barbican Association, Barbican Estate and Barbican and Golden Lane Neighbourhood Forum were also consulted. Comments from statutory consultees should be given great weight.
20. Copies of all letters received and emails making representations are attached in full and appended to this report. A summary of the representations received, and consultation responses is set out in the table below.

Consultation Responses	
Barbican Residents Association	<p><i>Opposes the proposal. The pipes are visible from many parts of the estate, including Defoe Highwalk and the Arts Centre lakeside. The upright pipes on roofs are not a characteristic of the Barbican's architecture.</i></p> <p><u>Officer response:</u> Matters relating to the design of the proposal and the status of the existing</p>

	buildings are set out in the design and heritage section of this report.
Barbican and Golden Lane Neighbourhood Forum	<p><i>Opposes the proposal on the grounds that the works are not in keeping with the distinctive and historic character of the Barbican Estate.</i></p> <p><u>Officer Response</u> Matters relating to the design of the proposal and the heritage impacts therein are addressed in the latter parts of this report.</p>
Conservation Area Advisory Committee	No objection.
Twentieth Century Society	No comments received.

18. 19 objections have been received in total across the planning and listed building consent applications. These are summarised below, separated into the key themes raised throughout the representations made.

Representations (Objections)	Officer Response
Proposals are ugly/unsightly and appear industrial or utilitarian	These matters are addressed in the design section of this report.
Not in keeping with the listed school's roofscape	
Not in keeping with the listed status of the estate	
Did not discuss the work with residents	<p>While minor in scale and therefore not triggering a requirement for pre-application consultation or the submission of a Statement of Community Involvement with the planning application, the City of London would encourage engagement of residents.</p> <p>In this circumstance, the proposal has passed through two statutory consultation processes and as such has been publicised in accordance with the City of London's duty as Local Planning Authority.</p>
The works now face north, directly towards nearby residential uses, while	The current arrangement is influenced by the requirements of the existing plant enclosure and

the previous arrangement saw the works face west.	providing safe access. This is explored further in the background section above.
Original design across the Estate accommodated integrated services hidden from site, while these are utilitarian and visible from public walkways, lake, gardens and Barbican Centre, and homes	These matters are addressed in the design section of this report.
The works should have gone through planning before works started/objection to consent being gained retrospectively	Acting as Local Planning Authority, the City of London must accept retrospective applications for planning and listed building consent.
New pipes are more intrusive than the previous, and taller	These matters are addressed in the design section of this report. Additionally, the proposed works now comprise smaller flues than those now installed.
Supporting structure is visible and ugly	These matters are addressed in the design section of this report.
Although small scale, changes set a precedent of which there would be an accumulation of already inappropriate alterations, harming the setting of the Estate/nearby heritage assets	These matters are addressed in the design section of this report.
Like for like replacements, while available, have not been used	The proposal is assessed on its merits as part of this report. The proposed works have been amended during the course of the application.
No evidence that expert heritage advice had been sought	Cowan Architects as architect and agent have submitted sufficient information to validate both planning and listed building consent applications.
No alternatives have been considered	Alternatives have been considered during the course of the application, with an alternative proposal subject of this report and recommendation.
Are there air quality concerns, has an air quality report been submitted, and do the proposals comply with the City of London's Air Quality Strategy	These matters are addressed in the residential amenity section of this report and, in summary, Environmental Health Officers have confirmed that they have no air quality concerns related to the proposal.

Policy Context

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 A to this report.

The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation in Spring 2024. It is anticipated that the City Plan will be submitted to the Secretary of State in Summer 2024. Emerging policies are a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix A to this report.

Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.

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.

Relevant City Corporation Guidance and SPDs comprising the Barbican and Golden Lane Conservation Area Appraisal (City of London, 2022) and Barbican Listed Building Management Guidelines vol 1 (City of London, 2012)

Considerations

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).

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 (Section 66(1) Planning (Listed Buildings and Conservation Areas) Act 1990). This duty must be given considerable weight and importance when weighing any harm to the setting of a listed building in the balance with other material considerations.

In determining a planning application for a building or land in the Barbican and Golden Lane Estates Conservation Area, special attention must be paid to the desirability of preserving or enhancing the character or appearance of that area (Section 72(1) Planning (Listed Buildings and Conservation Areas) Act 1990).

In determining a planning application for development which affects the Barbican Estate Registered Park and Garden, special regard must be had to preserving or enhancing the asset or its setting (Section 58B(1) Town and Country Planning Act 1990).

In considering the application for Listed Building Consent special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (Section 16(2) Planning (Listed Buildings and Conservation Areas) Act 1990).

The National Planning Policy Framework (NPPF) states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social, and environmental.

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

- a) approving development proposals that accord with an up-to-date development plan without delay; or
- b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - (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.

Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:

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

Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 135 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 and 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.

Paragraph 139 of the NPPF states that development that is not well designed should be refused, especially where it fails to reflect local design polices and government guidance on design.

Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 201 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 203 of the NPPF advises, "In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and I the desirability of new development making a positive contribution to local character and distinctiveness.”

Paragraph 205 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”.

Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Paragraph 208 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 or any features of special architectural or historic interest which it possesses.

Adopted City Plan Policy CS10 (3) seeks to promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City and creating an inclusive and attractive environment, by; ensuring that development has an appropriate street level presence and

roofscape and a positive relationship to neighbouring buildings and spaces.

Adopted City Plan Policy DM10.1 (7) requires plant and building services equipment to be fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted.

Emerging City Plan 2040 Policy S8(21) requires design solutions for plant and building services to be incorporated coherently into the architectural design. DE2(2k) states that the design of new development must ensure that; the plant and building services equipment are fully screened from view and integrated into the design of the building such that there are no adverse impacts on amenity in surrounding areas.

The Barbican Estate Listed Building Management Guidelines SPD 2012 sets out the significance of the Barbican Estate. The Barbican and Golden Lane Estate Conservation Area Appraisal 2022 describes the character and appearance and significance of the Conservation Area.

Relevant Statutory Duties

19. 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).

Considerations

20. 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.

21. The principal over-arching issues in considering this application are:
 - The extent to which the proposals comply with the relevant policies of the Development Plan.
 - The extent to which the proposals comply with Government guidance (NPPF).
22. The principal site-specific issues in considering this application (in accordance with the over-arching issues above) are:
 - Design and heritage, with particular regard to the special architectural and historic interest and heritage significance of the City of London School for Girls building within the listed Barbican Estate (II), and the character, appearance and significance of the Barbican and Golden Lane Conservation Area and Barbican Estate Registered Historic Park and Garden (II*).
 - Residential amenity.
23. These issues are considered in further detail below.

Design and Heritage

Design assessment, impact and conclusion

24. The proposed vertical discharge flues would be located to the north elevation of the western plant room roof exiting via existing louvres. The services are consolidated together, rise to 700mm above the finished flat roof level and terminate significantly below the apex of the plant roof and are supported by simple infrastructure. The services are also set some distance back from the northern building line towards the main body of the school. The pipework and infrastructure have been colour coded to blend with the background architecture of the louvres to further mitigate any potential visual impacts. The visual impacts are limited due to the positioning and scale of the modest addition confined to from some apartments to the north and west including: directly from Defoe House; and glimpsed in the distance from Seddon House; the reduced height of the proposals means the flues would now not be visible from apartments within Thomas Moore House but screened by the hipped roof to the plant room. From the public spaces around the Barbican there would be some visibility from the southern perimeter of Defoe Place but the reduced height by

600mm of the flues diminishes any wider significant visual impacts.

25. Where often momentarily glimpsed the flues would neither be prominent nor dominant and would be part of a relatively utilitarian roofscape and readily understood as incidental additions sitting alongside existing, practical structures associated with the functionality of the building including rooflights, balustrades and access ladders. The proposals would be entirely subordinate to the existing building, which is robust, architecturally striking and of a scale, materiality and detailed design which can absorb these subordinate interventions. The additional proposed access ladder to ensure safety would blend with existing similar structures.
26. The proposals are considered to integrate into the design of the building and would not adversely affect the character, appearance or amenities of the building or area or be unduly unsightly and would comply with Local Plan 2015 policies CS10, DM10.1, and draft City Plan policies DE2 (k).

Heritage – Direct Impacts

Barbican (Grade II*)

Heritage Significance:

27. In 2001 the whole of the Barbican Estate was listed, including landscaping and public areas, due to the pioneering design concepts employed by the architects which successfully combined a variety of uses across a large estate of dense, high-quality housing. The special interest of the Barbican Estate as a whole derives from the following values:

Historic Interest:

28. Barbican Estate was developed over a 20-year period between 1963 and 1982, designed by Chamberlain Powell and Bon with the CLSG building being one of the first completed blocks.
29. The Estate is a unique example of coherent inner city planning in the early postwar era, an exemplar of the Brutalist movement successfully combining a wide variety of uses including educational across a large estate of dense high-quality housing and realising key aspects of

contemporary planning including high-walks and megastructure.

30. Like other institutions within the Barbican Estate, the CLSG presence within the Barbican adds to the breadth of activities undertaken within the estate and adds a multi-generational vivacity to the place, embodying the optimism underpinning the masterplan.

Architectural and Artistic Interest:

31. The following values are considered to contribute to the architectural and artistic interest of the Estate:
 - The Barbican Centre as a centre of cultural excellence, with theatres, concert hall, cinemas, art gallery, library, conservatory and concert rooms. As well as a home for the CLSG, Guildhall School of Music & Drama feeding into the Barbican's investment in the cultural arts.
 - Uniquely combines a wide variety of uses across a large estate of dense, high quality housing, the Barbican Estate is a unique example of coherent inner city planning in the early post-war era combining key planning themes their time including highwalks and mega structures.
 - The plan form of the Barbican and its composition as a complete totality. This results from the integrated relationship between its buildings, spaces, canals and podium walkways.
 - The integral nature of the landscape design, demonstrating an evolving use of landscape within the estate while maintaining clear design intentions across the developments.
 - Structural expression of individual buildings such as barrel vaulted roofs and balconies associated with residential blocks, the scale and rhythm of columns, edge beams representing a three dimensional approach to masterplanning.
 - Consistent use of architectural language and limited palette of materials.
 - The Estate stands distinct from its surrounding area, both in terms of its overall scale, raised car free podium and in the differentiation of its unique architectural language.
32. The CLSG embodies the key values of the overall Estate. The school is designed in a distinctive idiom within the overall complex, but shares the architectural language and materials of the Estate including red semi-engineering brick on reinforced concrete frame, with exposed

concrete in piers and beams. The main block is of four storeys and semibasement, with a two-storey wing to side, which incorporates gymnasium and swimming pool. The main block has strong external grid of timber and aluminium windows recessed behind projecting brick piers with concrete tops. Surmounting this is a more lightweight roof set back on all elevations comprising four classroom spaces with connecting pavilions and two plant rooms with glazed roofs. There are minor alterations at this level including additional rooflights and an infill to the eastern most classroom and other functional utilitarian additions such as ladders and balustrades,

33. The planning of CLSG is also ingenious in fitting in a large school within the confines of the available site, inter-connecting with residential blocks to make maximum use of the limited space available. Internally the school is of special interest for the quality of its materials, the strongly architectural quality of its double-height spaces, staircase hall and infilled arcade and the double glazed hardwood windows and integral blinds.
34. The largest interventions to CLGS include the Dannatt Johnson addition of 1991 to the lower wing, alterations to the main entrance area internal and external all of which are considered to be of neutral significance. Other alterations are largely related to servicing, waterproofing, mechanical engineering and are functional in nature.

Archaeological Interest:

35. The designated heritage asset does not have any identified archaeological interest.

Impact

36. The proposed vertical discharge flues would be located to the north elevation of the western plant room roof exiting via existing louvres, The three pipes are consolidated together, rise to 700mm above the finished roof level and terminate significantly below the apex of the pitched roof to the plant area with support infrastructure. These are set some distance back from the building line of the main body of the school building towards of the centre of the roof. The pipework has been colour coded to blend with the background architecture of the

louvres to integrating the supporting structure and flues with the existing roofscape to further mitigate any potential visual impacts.

37. The scale of the addition relative to the overall CLSG complex and inset position on the roof results in an almost negligible visual impact. These impacts are limited due to the positioning and scale of the modest addition confined to some apartments to the north and west from: Defoe House; and glimpsed in the distance from Seddon House; the reduced height of the proposals means the flues would now not be visible from apartments within Thomas Moore House but screened by the hipped roof to the plant room. From the public spaces around the Barbican there would be some limited visibility from: the high level interior spaces of the Arts Centre; southern perimeter of Defoe Place but 600mm reduction in height of the flues diminishes any wider significant visual impacts. These small flues would read as discreet often fleetingly utilitarian services associated with the plant room and are expected additions at roof level.
38. The additions would neither be distracting from the overall architectural robustness and defining characteristics of the school, nor from its relationship with St Giles's Terrace, the Barbican Lakeside, surrounding lakes, public and private open spaces and Highwalks or the wider Barbican Estate. In all cases these elements and interplay between different megastructure components and the consistent materiality would be preserved. Nor would the additions be prominent or incongruous but instead would be readily understood if noticed as a functionality of the CLSG and part of the nature of its use. The roof of CLSG is not entirely pristine and the proposals would sit alongside rooflights, access ladders and balustrades at roof level.
39. These further minor visual additions would be neutral, are necessary and can be absorbed into the robust character, materials, and scale of the Barbican Estate and there would be no harm to the special architectural or historic interest underpinning its significance.
40. The internal changes to accommodate the flues and improved access within the plant areas do not affect areas of heritage significance and would have a neutral impact.

Barbican and Golden Lane Estate Conservation Area (BGLE Conservation Area)

Heritage Significance:

41. The significance of the Conservation Area is set out in the Barbican and Golden Lane Estates Conservation Area Appraisal 2022. The area is characterised by two distinct developments: Golden Lane Estate to the north and Barbican Estate to the south. The characteristics which contribute to the special interest of the Conservation Area are:
- Overarchingly, the character, appearance and heritage significance of the conservation area can be summarised as the striking juxtaposition between two seminal post-war housing Estates by Chamberlain, Powell and Moya which illustrate evolving trends in architecture, spatial and urban planning and Modernism in general.
 - Integration of the ancient remains of the Roman and medieval City wall, including Bastions 12, 13 and 14 and the medieval church of St Giles Cripplegate in a strikingly modern context.
 - In scope and extent, the estates are important visual evidence of the scale of devastation wrought by the WW2 'Blitz' bombing campaign of 1940-41.
 - Seminal examples of ambitious post-war housing schemes incorporating radical, modern ideas of architecture and spatial planning reflecting the development of both Modernism and Brutalism.
 - Unprecedented and ingenious provision of open space and gardens within central London, which continue to be a defining characteristic of the estates today.
 - New and striking architectural idioms, particularly at the Barbican, applied on a significant scale; a new architectural language deliberately modern and forward-looking; a way of planning and arranging buildings and spaces which was unprecedented in Britain and reflected evolving ideas of the modern city.
 - The pervasive modernity, by the consistency of modern forms, spaces and finishes throughout, all executed to a very high standard of quality and representing an immersive experience strikingly at odds with the more traditional townscapes and buildings outside the boundary.
42. CLSG as a component embodies these characteristics of the Conservation Area.

Impact

43. The proposed vertical discharge flues would be located to the north elevation of the western plant room roof exiting via existing louvres, The three pipes are consolidated together, rise to 700mm above the finished roof level and terminate significantly below the apex of the hipped roof to the plant area. The services are also set some distance back from the northern building line of the main body of the school towards the centre of the roof. The flues and supporting structure have been colour coded to blend with the background architecture to further mitigate impacts.
44. The scale of the addition relative to the CLSG and inset position on the roof results in an almost negligible visual impact. These impacts are limited due to the positioning and scale of the modest addition confined to some apartments to the north and west from: Defoe House; and glimpsed in the distance from Seddon House; the reduced height of the proposals means the flues would now not be visible from apartments within Thomas Moore House but screened by the hipped roof to the plant room. From the public spaces around the Barbican there would be some limited visibility from: the southern perimeter of Defoe Place but 600mm reduction in height of the flues diminishes any wider significant visual impacts. These small flues would read as discreet often fleetingly utilitarian services associated with the plant room and are expected additions at roof level.
45. The additions would not distract from the overall architectural robustness and defining characteristics of the school or its relationship with St Giles's Terrace, Barbican Lakeside, public and private open spaces and Highwalks or the wider Barbican and Golden Lane Estate Conservation Area and all relevant elements within key views would be preserved. The flues sit below the uppermost apex of the building and would not be unduly prominent or incongruous but instead would be readily understood if noticed as a functionality of the CLSG and part of the nature of its use. The roof of CLSG is not entirely pristine and these minor visual servicing additions are an incidental visual occurrence which is experienced throughout the rooftops of other buildings within the BGLE Conservation Area. There would be no adverse impacts on kinetic views and vistas through the Conservation Area.
46. Overall, any visual impacts to the character and appearance of the

BGLE Conservation Area would be neutral and be absorbed into its robust character, scale and complexity. The proposal would preserve the significance, setting, character and appearance of the Barbican and Golden Lane Estates Conservation Area.

Barbican Estate Registered Historic Park and Garden (RPG) (Grade II*)

Heritage Significance:

47. The landscape of the Barbican Estate was conceived and designed as an integral part of the architectural design by Chamberlain, Powell and Bonn with the architects recognising that the spaces between the buildings were of equal importance to the structures themselves. The landscape is now designated as a grade II* Registered Historic Park and Garden (2003), and, along with Alexandra Road Park, is one of only two post-war landscapes designated above Grade II within Greater London. Its heritage significance is derived from the following values:
- The creation of the Barbican as a vehicle-free environment through the raising of the precinct above ground level on the podium, creating vehicle-free space the quality and quantity of which is unparalleled in London.
 - The raised ground of the podium and the highwalks as an intrinsic and distinctive feature of the estate. The raised ground provides viewpoints from which to survey the surrounding city below, and, together with the limited entrances to the complex at ground level, contributes to the conception of the Barbican as fortified structure from the surrounding streets.
 - The contrast of the planning of the Estate with the grain and plan of the surrounding townscape, and the creation of characteristically unique dramatic vistas across the estate and into the surrounding townscape.
 - The successful designed relationships with 'found' historic elements including the Roman and Medieval wall, and the Church of St Giles Cripplegate and associated gravestones.
 - The urban character of the Barbican, and its conception and realisation as a new piece of urban fabric designed and delivered in its entirety by a single client and architect.
 - The consistent use of a small number of materials and detailing across the estate, delivering a powerful sense of visual continuity and consistency to the estate.

- The impact of soft landscaping and the value of experiencing the architecture of the Barbican in the context of trees, foliage, and greenery.

Impact on the heritage significance on the Barbican Registered Historic Park and Garden

48. The proposed vertical discharge flues and infrastructure would be located to the north elevation of the western plant room roof exiting via existing louvres. The three pipes are consolidated together, would rise to 700mm above the finished roof level and terminate significantly below the apex of the pitched roof to the plant area. These are also set some distance back from the building line of the main body of the school building. The pipework has been colour coded to blend with the background architecture has been colour coded to integrate with the background to further mitigate impacts.
49. Given the high level location, set back position on the CLSG and modest scale of the proposal any impacts on the Historic Registered Park and Garden would be minimal. Where there is visibility from the immediate Defoe Place this is very contained and the modest flues would read as discreet utilitarian services associated with the plant room and are expected additions at roof level which have no association with the public spaces. There would be no adverse impacts on key vistas or kinetic views across the landscape, between buildings and public spaces and walkways. The additional proposed access ladder to ensure safety would blend with existing similar structures.
50. The proposed development would have no impact on the identified values which contribute to the significance of the Barbican Estate landscape.

Overall conclusion on heritage:

51. Through the course of the application any potential harmful impacts to the designated heritage assets have been mitigated through reductions in height to the flues and changes in colour. Different options have been explored and the current proposals are supported by a clear and convincing justification to meet Building Regulations and enable the continued functioning of the CLSG science teaching functions and this satisfies para 20.

52. The proposals would have a neutral impact on the: special architectural and historic interest of the Barbican Estate as a listed building; the character and appearance of the Barbican and Golden Lane Conservation Area; and the significance of the Barbican Registered Park and Garden. The proposals would accord with Local Plan Policies CS 12 and DM 12.1, 12.2, 12.3 and 12.5 emerging City Plan policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs.

Residential Amenity

53. London Plan policy D13 ('Agent of Change') and Policy D14 ('Noise') requires development to limit and mitigate noise impacts from proposals.
54. Local Plan Policies CS21 (Housing) and DM21.3 ('Residential Environment') and draft City Plan policies S3 and HS3, requires amenity of existing residents in identified residential areas to be protected. Local Plan policy DM15.7 and Draft City Plan policy HL3 require noise pollution to be considered.
55. Local Plan policy DM10.7, draft City Plan policy DE8, and London Plan policy D6 to consider the impact of development on existing daylight and sunlight of residential properties.

Noise

56. Subject to control of noise through attachment of related conditions, the Environmental Health consultee has confirmed that they would have no objections. These conditions are proposed to be attached, ensuring that the noise level emitted is a minimum of 10 dBA below background noise level when measured from the nearest noise sensitive use. This is then monitored through a further condition requiring that noise measurements be taken and submitted for approval, demonstrating that this standard is met.

Air Quality

57. Environmental Health have confirmed that they would hold no objection to the increase in flue extracts proposed given this would improve the dispersion of discharged gases. The flue extracts themselves serve internal fume cupboard associated with the science

classrooms themselves, and thus any gas dispersed through these flumes would be commensurate to such a use. As such, there are no air quality concerns related to the works.

58. Concerning the reduction in height of the proposed flues from that as installed currently on site, further technical confirmation has been received that the distance between the flues at their amended height and the nearest opening to the building would be sufficient, in the context of the velocity of the dispersal of fumes, that there would be no risk of backspill and this would accord with the recommendations of the CLEAPSS guidance.

Daylight and Sunlight

59. The three pipes, falling significantly below the apex of the pitched roof, as well as being set back from the nearest roof edge by c. six metres and forty-five metres from the nearest residential neighbour, would give rise to no concerns as to daylight and sunlight impacts.

Conclusion on Amenity Impacts

60. It is not considered that the proposal would have an undue impact on residential amenity in accordance with relevant policies, subject to recommended conditions.

Sustainability

61. London Plan policy GG6 states that development should seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050 and to ensure buildings and infrastructure are designed to adapt to a changing climate including through making efficient use of water, and take an integrated and smart approach to the delivery of local infrastructure.
62. Local Plan Policy CS15 and Draft City Plan policy DE1 seeks to ensure development achieves highest feasible sustainability standards. Local Plan policies DM15.3 and DM15.5 require low and zero carbon technologies and commitment to climate change resilience measures and adaptation.
63. The purpose of the flues subject to this application is to best serve science classrooms within the building which feature fume cupboards.

As such, they are a necessity as driven by the nature of fume cupboards rather than a part of any upgrade or replacement of plant machinery on site. In this context, there are no sustainability concerns regarding the works.

Public Sector Equalities Duty

64. 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.
65. 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
66. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
67. 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.
68. This application has been assessed against the Equality Act 2010 and any equality impacts identified. The Applicants have held a range of meetings with stakeholders.
69. Potential impacts of the proposed development on the nearby occupiers have been assessed, including the impacts on the use and functionality of the spaces. Officers do not consider that nearby occupiers 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.

Human Rights Act 1998

70. 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”).
71. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate.
72. As set out above, it is the view of officers that there would be no infringement of Article 8 of the ECHR.

Conclusion

73. There would be a degree of visual impact by introducing additional external flues but the proposals would not be overly intrusive and there would have a neutral impact on the Barbican Estate (II), Barbican Estate and Golden Lane Conservation Area and the Barbican Estate Registered Historic Park and Garden (II*). The Estate is robust and architecturally striking and of a scale, detailed design, materiality and complexity, which can absorb these further incidental interventions. The proposals are necessary additions to support the continued operations of the CLSG.
74. Subject to conditions it is not considered that the works would have an undue impact on residential amenity.
75. Overall, the proposals are considered to accord with the development plan. 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

Drawings Titled:

0100 Rev. P1 – Site Location Plan

0150 Rev. P1 – Existing Upper Roof Plan

0151 Rev P1 – Proposed Upper Floor Plan

0153 Rev. P2 – Existing and Proposed 3D Views

0154 Rev. P2 – New Roof Flue Proposal – Reduced Flue Height

0155 Rev. P2 – Roof Enclosure Elevations, Previous, Current and Proposed Situation

Documents Titled:

Design and Access and Heritage Statement – Revised Version

Design and Access and Heritage Statement - Submission Version
(Superseded)

Design Statement - Public Vistas and Visual Context

Design Statement Summary

List of Neighbouring Objections

Amran Vance

Dr Paul Simmons

Sandra Jenner

Helen Hudson

Helen Clifford

Robert Hawkins

Simon Cooper

Eleanor Duffer

Dr Ruth Holt

Rodney Jagelman

David Mackie

Laurien Farmer

Nicholas Deakin
Dr Martin Farebrother
Richard Tomblin
Dr Richard Collins
Jan-Marc Petroschka
Brenda Szlesinger
Michael Jackso

List of Statutory Consultees Responses

Environmental Health Officer (x 2)
Historic England
Barbican Association
Conservation Area Advisory Committee
Hisotic England

Appendix B – Relevant Policies

Relevant London Plan Policies

HC1: Heritage conservation and growth

D6: Housing Quality and Standards

D13: Agent of Change

D14: Noise

GG6: Increasing efficiency and resilience

Relevant Draft City Plan 2040 Policies

S11: Historic Environment

HE1: Managing Change to Heritage Assets

S8: Design

IN1: Infrastructure provision and connection

DE1: Sustainability Standards

DE2: New Development

DE8: Daylight and sunlight

S3: Housing

HS3: Residential Environment

HL3: Noise and light pollution

Relevant Local Plan Policies

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

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

CS2 Facilitate utilities infrastructure

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

DM10.1 New development

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

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

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

CS10 Promote high quality environment

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

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:
 - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;

- b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM10.7 Daylight and sunlight

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

Policy DM 12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM2.1 Infrastructure provision

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

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

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

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

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

CS15 Creation of sustainable development

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

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

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

DM15.5 Climate change resilience

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

SCHEDULE

APPLICATION: 23/01066/FULL and 23/00825/LBC

City of London School for Girls, St. Giles Terrace, Barbican, EC2Y 8BB

Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

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 All new work and work in making good shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile, unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this permission.

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

- 3 a) Proposed materials for the shortened fume extract pipework subject to this consent will be submitted for approval to the Local Planning Authority.

b) A notice of completion must be provided to the Local Planning Authority within two months of completion of the proposed works.

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: CS10, DM10.1, DM12.2, DM12.3 and emerging policies DE2, and HE1 of the Draft City Plan 2040

- 6 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: 0100 Rev. P1, 0150 Rev. P1, 0151 Rev P1, 0153 Rev. P2, 0154 Rev. P2, 0155 Rev. P2.

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 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as ground landlords; and the work must not be instituted until the consent of the City of London Corporation as freeholders has been obtained.

Memo

To Assistant Director (Development Management)
Department of the Built Environment

Email: [REDACTED]



From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection

Telephone [REDACTED]

Email [REDACTED]

Date 26 October 2023

Our Ref 23/02957/NPLN

Your Ref 23/01066/FULL

Subject City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure.

Thank you for your memorandum. I have reviewed the application and I have no objection to the granting of this application as the proposal will improve the dispersion of discharged gases.

Regards

[REDACTED]

Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

City of London PO Box 270, Guildhall, London EC2P 2EJ

Switchboard 020 7606 3030

www.cityoflondon.gov.uk

Guildhall, London, EC2P 2EJ

Mob:





Ms Steph Taylor

Direct Dial: 020 7973 3764

City of London Corporation

Environment Department

Our ref: P01567678

26 October 2023

Dear Ms Taylor

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**CITY OF LONDON SCHOOL FOR GIRLS ST GILES' TERRACE BARBICAN
LONDON EC2Y 8BB
Application No. 23/01066/FULL**

Thank you for your letter of 25 October 2023 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





Historic England

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Charlotte Cartwright
Business Officer

E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Representing the interests of Barbican Residents

BA Planning Sub-Committee
c/o 307 Seddon House
Barbican,
London

FAO: Ms Steph Taylor
Planning Officer
Department of the Built Environment
City of London PO Box 270,
Guildhall.
London EC2P 2EJ

6th November 2023

Dear Ms Taylor

Re: City of London School for Girls; Ref: Planning application: 23/01066/FULL

I am writing on behalf of the Barbican Association to **object** to the above retrospective application “*for removal of 3 fume cupboard discharge flues and installation of 3 new extract flues to existing roof plant enclosure*”. The Barbican Association represents the 4500 or so residents who live on the estate and is also committed to preserving the design and heritage integrity of this grade II listed estate and grade II* listed landscape.

We note that this application is for retrospective listed buildings approval, given that the works for which permission is now sought have already been completed. We also note that this application is for full planning permission as the applicant had failed to submit such an application, only submitted an application for Listed Building Consent approval at the end of July. The application for Listed Building Consent approval was submitted on 28th July 2023 and the Barbican Association objected to this in its submission to the then case officer Ms Lin Zhao on 5th September 2023. This objection letter mirrors those views and are therefore repeated here.

The City should be corporately embarrassed that those responsible for a listed building that the City owns and manages did not seek listed building consent for works that affect the look of the exterior of the building and may breach the listed building management guidelines for the Barbican Estate (see for example volume IV 1.7.11.6).

We understand that these works on the school’s roof were originally intended to be “like for like” so that they would not need planning permission/listed building consent, but they got changed.

The effect of the change is to make visible on the roof of the school three upright pipes. As a resident who overlooks the area has commented; *“they extend above the roofline in a way the old (horizontal) pipes didn’t. And: they’re the only visible plumbing pipes anyone can see, certainly from my pretty extensive view - the architects of the estate would simply not have conceived of allowing them to be seen (the lack of visible pipework generally in the Barbican is quite brilliant).”*

The point is that upright pipes on roofs are not a characteristic of the Barbican’s architecture, and we object to them becoming so. We ask that the school reverts to using pipes that are horizontal or in any case do not extend above the roof.

Although officially “no planning permission sets a precedent” everybody knows that in practice once someone has done something, someone else will later point to that as a reason why they should do it too. These pipes will inevitably be used as justification for the next set of pipes the school wants to put on its roof.

The Design and Access statement says that the entire third floor and roof plant are not original elements of the heritage asset. But they are part of the listed estate, and at some stage they would have had listed building consent. That statement seems to show weak appreciation for the nature of listing. The Design and Access Statement also shows clearly that the original flues did not rise above the roof line and that the new ones do so. It explains the reasoning for the new flues but it does not justify their visibility above the roof line in heritage terms (and the flues were only painted a compliant colour once the problem had been pointed out). This is a feeble retrospective justification.

Had the CLSG sought listed building consent from the outset, an alternative solution that met the school’s requirements but did not spoil a heritage landscape might well have been arrived at.

John Allan, the architect who co-ordinated and wrote the Listed Building Management Guidelines for the City, commented at a Barbican Association/Barbican Centre workshop on the Barbican Estate at 50 that formal major projects were less of a threat to future integrity because they were the subject of formal applications. *“But continuous everyday change in a process of steady accumulation can alter progressively the nature of the architecture.”*

That is the risk here – we urge the City to reject this application, ensure that the school restores the pipes to their horizontal state and reminds it of its obligation to seek consents.

The Barbican Association often thinks that the City does not appreciate what a unique and world class example of urban design it has in the Barbican – as recognised in its listing. We hope it will show we are wrong by objecting to these pipes.

I attach to this letter some relevant extracts from volumes I and II of the Barbican Listed Building Management Guidelines.

Yours sincerely

Jane Smith
Chair, Barbican Association Planning Subcommittee

Extracts from Supplementary Planning Documents

Barbican and Golden Lane Conservation Area Supplementary Planning Document 1 February 2022

Overall character

The Barbican Estate is characterised by its singularity of composition, enormity of scale and sublimity of effect. It is less an aggregate of individual buildings and more a single, consistent piece of architecture that expresses its basic formula (bush-hammered concrete, orthogonal forms, lateral or vertical emphases) in a series of building typologies that are arranged to produce effects of void, depth and awe.

Barbican Estate Listed Building Management Guidelines Volume 1

City of London School for Girls.

The school is of special interest for the quality of its materials, the strongly architectural quality of its double-height spaces, staircase hall and infilled arcade, and for the way its complex plan fits logically into an awkward site. It has been extended by Dannatt. It was the first part of the Barbican complex to be completed.

5. ‘Special architectural and historic interest’ of Barbican Estate as a whole

5.3 The Barbican Estate is of special architectural and historic interest, and its significance is explored in detail in Volume II of these guidelines. Volume II deals specifically with the residential parts of the Barbican. Some sections are applicable to and would provide valuable guidance to all stakeholders intending to carry out works on the estate. Particular attention is drawn to Sections 2 - Special Interest (with particular regard to materials), 3.1 - External Elements, and 4. - Best Practice. These sections have relevant information which provide important guidance and indicate those works that are acceptable, those that may need consent, and works which will affect the special interest of the Barbican Estate to the extent that they are unlikely to receive approval.

Barbican Estate Listed Building Management Guidelines Volume 2

1.2.2.14 There is an ongoing cycle of repair and maintenance to the external fabric of the Barbican which must be implemented systematically within an informed Estatewide framework of best practice. This is of self-evident importance in ensuring that any major works projects are undertaken in full cognisance of the architectural significance of the buildings, and are prepared and executed with due process strictly observed. However it is equally important that cumulative minor works operations on the exterior of the buildings or public spaces do not impact adversely on the character and special interest of the Estate as a whole. Uncoordinated or thoughtless interventions – for example surface mounting of service installations, or ill-matched ‘repairs’ or replacements – can be highly detrimental to the overall sense of order and integrity of the original design. It is essential that effective protocols are applied and observed in the control and management of ‘small contract works’.

2.2.6 The other components of the complex – including the Barbican Centre, the City of London School for Girls, the Guildhall School of Music and Drama, the YMCA Hostel, the historic church of St Giles Cripplegate and fragments of Roman walling, the expanses of landscaping and water – are of vital significance in diversifying and enriching the amenities and social facilities of the Estate. Yet these are all contained within the residential framework. The significance of this is that much of the character and formal identity of the Barbican is vested in its residential buildings and the spatial interrelationship between them and these other components.

2.2.7 The limitation and effective control of any change in the external fabric of these buildings, and the exterior spaces they contain and define, is therefore of the utmost importance in preserving the special character and architectural integrity of the Barbican Estate as a whole.

3.1 Guidance for External Elements

3.1.5 BLACK Proposals for which a LBC application would be required but where consent is unlikely to be granted

These constitute works which would almost certainly have a detrimental effect on the character and special architectural interest of the residential blocks and therefore will require a LBC application. Any application to change or alter the mass, foot print, height and silhouette or the original architectural character of the elevations of any listed block is likely to be refused.

4.1 Best Practice for Roofs and Terraces

4.3.3 It is therefore vital that the works are carried out with care and through detailed examination to ensure that original service zones, containments (ducts/ trunking/conduits) and routes are used. When, and only when, such investigations indicate inadequacies within the existing services provisions should consideration be given to any new design. Extreme care should be exercised and detailed consideration must be given to ensure that the visual impact of the new proposals on the architecture is kept to an absolute minimum.

4.3.7 Cyclical maintenance, repairs or upgrade works should be carried out with due care and attention to eliminate the potential of any adverse impact on the architectural character and consistency of the Estate.

4.3.8 In general, new surface mounted services should be avoided, and any opportunity should be taken to remove non-original redundant services installations, adhoc additions and fixings.

4.3.9 The services fall into two broad but significant categories:

- Visible services; including plant distribution systems and fittings, on the external elevations and the roofscape and terraces, and on the inside of the communal internal areas. Being manifested visibly any such services, or new additions, are likely to affect architectural character and heritage significance and accordingly be subject to listed building consent.

Adjei, William

From: PLN - Comments
Subject: FW: 23/01066/FULL - City of London School for Girls

From: Brenda Szlesinger <
Sent: Wednesday, January 17, 2024 9:35 AM
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Re: 23/01066/FULL - City of London School for Girls

THIS IS AN EXTERNAL EMAIL

Flat 112 Thomas More House
EC2Y 8BU

From: Brenda Szlesinger
Sent: Wednesday, November 29, 2023 9:05 AM
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 23/01066/FULL - City of London School for Girls

THIS IS AN EXTERNAL EMAIL

The Barbican and Golden Lane Neighbourhood Forum objects to the above retrospective planning application on the following grounds:

- 1.The new pipes are not a like for like replacement of the previous flues.
- 2.The fact that neither listed buildings consent nor planning permission were sought prior to the works suggests a disrespect for both the planning process and important heritage assets
3. The replacement flues are not sympathetic to the surrounding Grade II listed landscape. The replacement flues substantially harm the setting of both the listed Estate and the Conservation Area.
4. Historically, Barbican services have been either decorative or integrated and obscured from view. The applicant's claim that the new flues are barely visible is simply not true.

We urge you to REJECT this application.

Barbican and Golden Lane Neighbourhood Forum

Registered business address: [20 Wenlock Road, London, England, N1 7GU](https://www.google.com/maps/place/20+Wenlock+Road,+London,+England,+N1+7GU)

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City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

30th November 2023

Dear Sir/Madam,

At its meeting on 16th November 2023 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.108 23/01066/FULL - City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Barbican and Golden Lane Conservation Area/Cripplegate Ward. Ward Club rep. David Ayres.

Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure.

There were no objections.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,

Mrs. Julie Fox
Secretary



Ms Steph Taylor
City of London Corporation
Environment Department

Direct Dial: 020 7973 3764

Our ref: P01567678
3 April 2024

Dear Ms Taylor

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**CITY OF LONDON SCHOOL FOR GIRLS ST GILES' TERRACE BARBICAN
LONDON EC2Y 8BB
Application No. 23/01066/FULL**

Thank you for your letter of 25 October 2023 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
[HistoricEngland.org.uk](https://www.historicengland.org.uk)





Historic England

Charlotte Cartwright

Business Officer

E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
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Memo

To Assistant Director (Development Management)
Department of the Built Environment

Email: [REDACTED]



From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection

Telephone [REDACTED]

Email [REDACTED]

Date 04 April 2024

Our Ref 24/01960/NPLN

Your Ref 23/01066/FULL

Subject City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure (RECONSULTATION DUE TO AMENDED DRAWINGS AND ADDITIONAL INFORMATION). |

Thank you for your memorandum. I have reviewed the application and I would recommend that the following condition be attached to any consent :

(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 most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the 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.

City of London PO Box 270, Guildhall, London EC2P 2EJ

Switchboard 020 7606 3030

www.cityoflondon.gov.uk

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Regards



Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob:



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Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Mr Amran Vance

Address: Flat 17, Defoe House Barbican LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: The three exhaust pipes will be visible from the Barbican Art Centre, from the public podia, and from the surrounding residencies. They would be an ugly and unsightly addition and not in keeping with the listed school's roofscape. or the Grade II Barbican estate.

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Mrs Laurien Farmer

Address: 170 Defoe House, Barbican, London EC2Y 8ND

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The application states that in response to initial feedback from the planning department, the flues have been painted to match the existing colour, "to aid camouflage, and to respect the Barbican residents' vistas". Two points:

1) one wonders why as well as consulting the planning department, the applicant did not discuss the work with residents.

2) If by camouflage the applicant means hide, they are not hidden. The previous flues were not visible by us. The new ones are, because instead of facing west as previously, they now face north i.e. directly across from our apartment. Also, there are more of them, and they are higher. This does not demonstrate respect for residents' vistas.

Apart from being unsightly, the new flues are out of keeping on a Grade 2 listed building in a conservation area.

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Dr Nicholas Deakin

Address: Flat 372, Lauderdale Tower, Barbican Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: The Girls School and broader listed Barbican estate was carefully designed with integrated services all well hidden from plain sight, and where visible these were done with very high quality materials and iconic design motifs.

On the contrary, the three utilitarian exhaust pipes are visible from the public walkways, lake, gardens and the Barbican Centre- not to mention the houses/apartments which surround the school.

The installed chimneys are unsightly, utilitarian (and not in a good way) to the listed school's roofscape and to do so with only retrospective permission sets a very dangerous broader precedent for other buildings on the Estate.

The work looks like it's at home on an industrial estate, warehouse or isolated school but not within the setting of the Grade II listed Barbican Estate and the Conservation Area.

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Dr Martin Farebrother

Address: 117 Defoe House Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment:1 The new pipes are already in place, and the application is retrospective. This should not be allowed

2 the new pipes are more obtrusive than the old ones -

- they are 3 (old ones 2)
- they are on the north side (facing the lake and the Barbican centre), old ones on the west side
- they are much taller
- the supporting structure is visible, and ugly

3 the whole is not in keeping with the listed status of the estate. The already extended roof of the Girls' School is not the most attractive part of the estate even without this new pipework. Although it could be claimed to be only a small change, the accumulation of small changes such as this may lead to as much of a threat to the overall architecture of the estate as can a single large change, which would be much more carefully scrutinised.

4 as a resident in Defoe house, the pipes are visible from our apartment (as were the old ones), and the additional obtrusiveness of the new pipes leads directly to a loss of amenity for us (myself and my wife).

5 I have examined the details of the 'proposed' (actually existing) pipes. The report by Cowan (Architects) states that the proposals meet the requirements of the school for safety. I did not see any evidence presented that any alternative ways of meeting the needs of the school were examined, and if they were, why they were rejected in favour of the already executed scheme.

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Mr Richard Tomblin

Address: Flat 160, Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: My objection is based on the appearance of the replacement pipes, which project above the roofline of the school. The pipes are completely out of keeping with the design of the rest of the estate - indeed the surrounding nationally important architecture is notable for the absence of any visible pipe work or conventional guttering.

The Barbican is the epitome of design by architect- down to the smallest detail of window and door handle.

These pipes are a basic builders solution to a practical problem, and have absolutely not been subject to any design other than that of the industrial estate. They should be removed.

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Dr Richard Collins

Address: 4 Lambert Jones Mews London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The Barbican is Grade II listed - this imposes a duty on owners/operators of buildings on the Estate to maintain the appearance of the ensemble created by Chamberlin, Powell and Bon. Regrettably, the Girls' School is a serial offender in disfiguring the external appearance of its building and its unauthorised construction of three vent/exhaust pipes has further disfigured the carefully planned profile of a key element in the Barbican ensemble. The new pipes are unsightly and pervasively visible from homes and the public and residential areas of the Estate. They are not in keeping with the historic appearance of the Estate, are incompatible with a Grade II listing and inappropriate to a Conservation Area. Permission should not be granted.

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Mr Jan-Marc Petroschka

Address: 349 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object to the above retrospective planning application on the following grounds:

- 1.) The new pipes are not a like for like replacement of the previously existing flues. As such the new flues should have been carefully designed, concealed and NOT visible from public or private spaces.
- 2.) The proposed exposed pipes are contrary to the design ethos of the Barbican were services were either designed as decorative features or integrated and hidden from view.
- 3) Although small in scale, the proposed exposed pipes set a hazardous precedent and with the accumulation of already inappropriate alterations and furthers to follow, will seriously harm the setting of the Grade II listed Barbican Estate and the Barbican and Golden Lane Conservation Area.
- 4.) The works were implemented without a clear design strategy and without the sensitivity that the listed buildings require. I therefore call on officers to reject this application and request an alternative solution in the spirit of the Barbican and its exceptional design quality.

Begum, Shupi

From: Brenda Szlesinger [REDACTED]
Sent: 21 November 2023 14:20
To: PLN - Comments; Taylor, Steph
Subject: Planning reference: 23/01066/FULL

THIS IS AN EXTERNAL EMAIL

I OBJECT to application 23/01066/FULL on the following grounds:

1. The works should not have been carried out without the requisite planning and listed building consents. The decision to execute the works demonstrates complete contempt for the planning process. The current attempt to present the works as a fait accompli should be subject to the highest scrutiny. Such disregard should be discouraged.
2. The Barbican Estate is Grade II listed. The claim by Cowan Architects that the flues are barely visible from the public areas is wrong as a matter of fact. The image below was taken from the Defoe Highwalk which is a public highway. The following statement by Cowan Architects is mere wishful thinking:
"As is evidenced in the latest photographs, the new flues blend in well with their surroundings".
It is clear from the image below that the flues stand out.
3. No evidence has been submitted by the applicant that any expert heritage advice has been sought. To what extent have alternatives that are sympathetic to the surroundings been considered? Where is that evidence documented? The original application was for a like for like replacement. This is not what has materialised on the roof of the school.
4. Approving this application will set a dangerous precedent for this listed estate. It will encourage a laissez-faire approach to adding plant to the roof-tops and other areas in the knowledge that retrospective permission will be simply waved through by the Planning Department. Listing status is an indicator of the heritage value of the whole estate and must be preserved.
5. Finally, in the Cowan report, there is a reference to "contaminated air". Is there an air quality report in support of this application? Does this comply with the City's air quality strategy?

I urge you to REJECT this application.

Brenda Szlesinger
Flat 112 Thomas More House
Barbican EC2Y 8BU



Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Michael Jackso

Address: 120 Thomas more jouae London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Like for like replacements are available

These were not used

We need to ensure that contractors do their best - it's difficult sometimes but this time it wasn't

Michael

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Dr Paul Simmons

Address: flat 96 Thomas More House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: Fait accompli is not a reason to approve this retrospective application. The School has a history of 'creep'; indeed the architects themselves admit to the service top floor being on top of the original design. What we have now is a roofscape that is out of character with the general ambience of the Barbican estate as viewed from the terrace or upper story flats. It appears industrial in a mainly residential conservation area. The original plan was like for like replacements and then it seems to have got tangled up with safe access. Painting the new flues to try to camouflage them is worthy but really misses the point. This illustrates yet again that the School is really getting too big for its site.

Begum, Shupi

From: Sandra Jenner [REDACTED]
Sent: 21 November 2023 15:33
To: PLN - Comments; Taylor, Steph
Subject: Fwd: Planning reference: 23/01066/FULL

THIS IS AN EXTERNAL EMAIL

I OBJECT to applica~~o~~n 23/01066/FULL on the following grounds:

1. The Barbican Estate is Grade II listed which is an indicator of the heritage value of the whole estate and must be preserved.
- 2 The works should never have been carried out without the requisite planning and listed building consents. The decision to execute the works clearly flouted the planning process. The School and their advisers must have known this. Such disregard should be discouraged.
- 3 The Architects say that the flues are barely visible from the public areas. This is incorrect. They can be seen clearly from the Defoe Highwalk which is a public highway. Nor do they "blend in well with their surroundings".
- 4 More appropriate alterna~~o~~ves that are sympath~~e~~c to the surroundings should have been used? The original applica~~o~~n was for a like for like replacement. The flues on the school roof are not like for like.
4. If such an applica~~o~~n were to be approved it will set a precedent and encourage similar approaches with plant added to roof-tops and other areas nilly nilly in the knowledge that retrospec~~o~~ve permission will be simply waved through by the Planning Department.

I strongly objec~~o~~n to the applica~~o~~n and the Commi~~s~~ee is urged to reject it.

Kind regards

Sandra Jenner
52 Defoe House
Barbican
EC2Y 8DN

Begum, Shupi

From: Helen Hudson [REDACTED]
Sent: 22 November 2023 04:49
To: PLN - Comments
Subject: OBJECTION : Planning reference: 23/01066/FULL

THIS IS AN EXTERNAL EMAIL

I OBJECT to application 23/01066/FULL on the following grounds:

1. The undertaking of these works without the necessary planning and listed building consents reflects a blatant disregard for the planning process. The attempt to present the completed works as a fait accompli should be subjected to thorough scrutiny. Such negligence needs to be strongly discouraged.
2. The Barbican Estate holds Grade II listing, and the assertion by Cowan Architects that the flues are hardly visible from public areas is factually incorrect. A view from the Defoe Highwalk, a public thoroughfare, contradicts Cowan Architects' optimistic claim that the new flues seamlessly blend with their surroundings. The visual evidence makes it evident that the flues are conspicuous.
3. The applicant has not provided any evidence indicating consultation with heritage experts. The consideration of alternatives that harmonize with the environment is unclear. Where is the documentation supporting this? The initial application proposed a like-for-like replacement, but the actual installation on the school's roof deviates from this plan.
4. Approval of this application would establish a risky precedent for the listed estate, potentially endorsing a casual approach to adding infrastructure to rooftops and other areas. This could lead to a belief that retrospective permissions will be easily granted by the Planning Department. Preserving the listing status, which signifies the heritage value of the entire estate, is imperative.
5. The Cowan report mentions "contaminated air," but no supporting air quality report is provided with this application. Does this align with the City's air quality strategy? It is crucial to ensure compliance before considering approval.

In light of these concerns, I strongly advocate for the rejection of this application.

Helen Hudson
Flat 15 Defoe House
Barbican EC2Y 8DJ

Begum, Shupi

From: Helen Hudson [REDACTED]
Sent: 22 November 2023 04:54
To: PLN - Comments
Subject: Planning reference: 23/01066/FULL

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

I formally oppose application 23/01066/FULL based on the following grounds:

1. The execution of these works without obtaining the requisite planning and listed building consents demonstrates a blatant disregard for the established planning process. The attempt to portray the completed works as a *fait accompli* should undergo rigorous scrutiny, and such negligence must be strongly discouraged.
2. The applicant has not furnished any evidence demonstrating consultation with heritage experts. The consideration of alternatives that align with the environment remains unclear, and documentation supporting this is absent. Although the initial application proposed a like-for-like replacement, the actual installation on the school's roof deviates from this plan.
3. The Barbican Estate is designated as Grade II, and the claim by Cowan Architects that the flues are barely visible from public areas is factually inaccurate. An observation from the Defoe Highwalk, a public pathway, contradicts Cowan Architects' optimistic assertion that the new flues seamlessly integrate with their surroundings. Visual evidence clearly reveals the conspicuous nature of the flues.
4. Approval of this application could set a precarious precedent for the listed estate, potentially endorsing a lax approach to adding infrastructure to rooftops and other areas. This may foster the belief that retrospective permissions will be readily granted by the Planning Department. Preserving the listing status, indicative of the heritage value of the entire estate, is of utmost importance.
5. The Cowan report references "contaminated air," yet no accompanying air quality report is provided with this application. Does this align with the City's air quality strategy? Ensuring compliance is crucial before contemplating approval.

Considering these concerns, I strongly advocate for the rejection of this application.

Sincerely,

Helen Clifford Flat 34 John Trundle Court Barbican EC2Y 8DJ

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Robert Hawkins

Address: 27 thomas more Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I received a troubling message from Thomas More House Board today that detailed how construction work had been done on 3 vents on the girls' school roof. This was done without permission and did not come close to following or even making any attempt at following, the lawful guidelines of like for like replacement.

Considering that the roof of the girls' school has for 30 years been the ugliest part of the Barbican property, its really a moot point, but the fact that there was improper work done without having permission to do so is another example of the blatant disregard for rules laws and regulations that protect the Barbican and its residents, and has only increased resentment and strengthened sentiments to battle the City of London's irresponsible, indiferent and venal (money based) attitude toward the Barbican. This is what I am complaining about now. I don't care about the hideous roof of the Girls school that I've had to look at for 26 years, I am complaining about your disregard for rules and regulations. In America the term used for what has been done so iften is "scoff-law", but the City of London does not seem to have a comparable term in its vocabulary. This is a formal complaint, hopefully., Although I expect nothing from the City of London nor the Barbican Estate Corporation.

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Mr Simon Cooper

Address: 27 Thomas More House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This is a retrospective application for work that did not follow the original plan. Such an approach is unacceptable.

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Ms Eleanor Duffy

Address: 115 Thomas More House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: The school has already significantly undermined the original design intent for the roofline of this building through unfortunate extensions over the years - but that is no reason to make things worse.

It is not a good look for a school to apply for pp retrospectively - what sort of message does that convey to pupils let alone the rest of the world?

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: Dr Ruth Holt

Address: 96 Thomas More House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Gaining retrospective planning application in this way sets a very unwelcome precedent. The City of London School for Girls has put in repeated applications for a number of expansion projects that encroach on the Barbican estate, its architecture and nature. This apparently harmless piece of work has been agreed (retrospectively) without any evidence of the project being properly considered. The City Corporation needs a much more active stance on conserving and maintaining the Barbican estate architecture and detail.

Begum, Shupi

From: Rodney Jagelman [REDACTED]
Sent: 24 November 2023 14:21
To: PLN - Comments
Subject: City of LondonSchhol for Girls

THIS IS AN EXTERNAL EMAIL

This email relates to the application for retrospective permission to reeplace three extract flues. Reference 23/01066/FULL and is for the attention of StephTaylor whom we understand to be the case officer dealing with this application.

Retrospective permission is a serious matter not to be lightly granted.. I do not know wherter the failure to adhere to the proper procedures was an act of carelessnesson the part of the staffand/or governors of the school or a cynical attempt on their part to get away with saving time and money by acting unlawfully or something in between.

The school should replace the flues on a like for llike basis . That is the way that the integrity of the estate will be preserved and slackness in enforcing the proper procedures is unfair on all of us who respect the regulations. It is especially unseemly for the Corporation as planning authority to appear to connive with the staff/ trustees to whitewash the latter's failings as an institution with which the Corporation is so closely connected.

Rodney Jagelman

153 Thomas More House

Comments for Planning Application 23/01066/FULL

Application Summary

Application Number: 23/01066/FULL

Address: City of London School For Girls St Giles' Terrace Barbican London EC2Y 8BB

Proposal: Retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure

Case Officer: Steph Taylor

Customer Details

Name: David Mackie

Address: 41 Thomas More House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I agree with the other two objections I have read and do not repeat them but add this. The consent was for flues to be like for like. There is no suggestion that the construction team even tried to comply with this requirement. Whatever the motives for this, it seems an abuse of the planning system and consent should be refused for that reason alone.