



Planning Applications Sub-Committee

Date: FRIDAY, 26 JANUARY 2024

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

Members:

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

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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 8 December 2023.

For Decision
(Pages 5 - 18)

4. **30-33 MINORIES AND WRITERS HOUSE, 13 HAYDON STREET, LONDON, EC3N 1PE**

Report of the Planning & Development Director.

For Decision
(Pages 19 - 234)

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

Report of the Planning & Development Director.

For Information

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

Report of the Planning & Development Director.

For Information

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

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

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PLANNING APPLICATIONS SUB-COMMITTEE

Friday, 8 December 2023

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Friday, 8 December 2023 at 3.00 pm

Present

Members:

Deputy Shravan Joshi (Chairman)
Graham Packham (Deputy Chairman)
Brendan Barns
Ian Bishop-Laggett
Mary Durcan
John Edwards
Deputy Marianne Fredericks
Jaspreet Hodgson
Deputy Charles Edward Lord
Deborah Oliver
Alderwoman Susan Pearson
Judith Pleasance
Luis Felipe Tilleria
Jacqui Webster

Officers:

Zoe Lewis	-	Town Clerk's Department
Fleur Francis	-	Comptroller and City Solicitor's Department
David Horkan	-	Environment Department
Tom Nancollas	-	Environment Department
Gwyn Richards	-	Environment Department
Amy Williams	-	Environment Department
Peter Wilson	-	Environment Department

1. APOLOGIES

Apologies for absence have been received From Deputy Randall Anderson, Michael Cassidy, Anthony Fitzpatrick, Deputy John Fletcher, Deputy Alastair Moss, Alderman Robert Hughes-Penney, Deputy Henry Pollard, Alderman Simon Pryke, Ian Seaton, Hugh Selka, Shailendra Umradia and William Upton KC.

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

There were no declarations.

3. MINUTES

The Sub-Committee considered the public minutes of the last meeting held on 20 November 2023 and approved them as a correct record

4. CRESCENT HOUSE, GOLDEN LANE ESTATE, LONDON, EC1Y 0SL

The Sub-Committee considered a report of the Planning and Development Director concerning repairs and minor alterations to the existing windows and window framing at first, second and third floor levels of Crescent House, including: stripping, repairing and redecorating existing window frames; replacement of existing single-glazing with vacuum glazing panels; insulation works to the main concrete vaulted roof and first floor concrete soffit; and associated works.

The Town Clerk referred to those papers set out within the main agenda pack as well as the Officer presentation slides and an addendum that had been separately circulated and published. She stated that Item 4 – Full Application for Crescent House, Golden Lane Estate, London, EC1Y 0SL and Item 5 – Application for Associated Listed Building Consent would be considered together.

Officers presented the application, highlighting that the application site was on the edge of the Golden Lane Estate. The buildings of the estate were Grade II listed and Crescent House was Grade II* listed. It was both part of the Barbican and Golden Lane Conservation Area and was itself a registered park and garden.

Members were shown the principal west elevation of the building up and down Goswell Road and were informed that it was regarded as a seminal work of architecture by Chamberlin, Powell and Bon with the significance of the buildings assessed at full in Paragraphs 70 to 82 of the report.

Members were shown an image of the east elevation facing into the Golden Lane Estate, a general arrangement plan showing Members how the flats were arranged around a central corridor running through the building and west, east, north and south elevations of the building.

Members were shown a photograph of the window arrangement, taken after installation in 1962 and a photograph of the condition of the window today showing the minimal amount of change apart from ad hoc works. The condition of the windows today had prompted this application and the pilot project that preceded it.

The Officer informed Members that the proposals had four main elements: - 1) the repair of the window frames; 2) the replacement of the glass with vacuum insulated glass; 3) the installation of insulation; and 4) additional ventilation. The Officer stated that last year, consent was granted for a pilot project at 347 Crescent House.

Members were shown photographs taken before and after the works. Members were informed that the pilot project had indicated that there would be around a 50% reduction in both in energy demand and in external noise transmission. The window frames would be stripped and assessed and then repaired to varying degrees, depending on the extent of defects.

Members were shown images of the new module of vacuum insulated glass. The Officer stated that this was a sensitive addition that would look largely similar to the existing single glazing.

Members were shown images of the existing condition and proposed condition of the main timber windows, vertical pivot windows and jalousie windows. The Officer stated that slightly more work was proposed to the jalousie windows, replacing the existing windows with a new panel of glazing that would be fixed in position to prevent excessive air and heat leakage.

In relation to insulation, Members were shown images of how the existing inbuilt bookshelf would be lined with aerogel insulation and insulation would be applied to the main barrel-vaulted roof, the kitchen windows and to the ground floor soffit of the arcade. This would alter the profile of the kitchen windows and the appearance of the soffit of the arcade.

Members were informed that ventilation was proposed to be amended with a demand-controlled ventilation system relying mainly on a new fan in the bathroom and a new trickle vent discreetly located in the window frame. Members were shown images of these proposals.

The Officer stated that the proposal amounted to quite minor work to the listed building, albeit across the extent of the building to all flats. Members were shown the comparatively minimal external appearance of the flats within the pilot project. The Officer stated that the proposed work would also deliver substantive, thermal and environmental benefits, and was therefore recommended for approval.

The Chairman explained that there were two registered objectors to address the meeting and he invited the objectors to speak. In addition, Deputy King would address the meeting in support of the objectors.

Mr Philippe Rogueda, stated that he was a resident and leaseholder in Crescent House. He stated that other residents of Crescent House were also in attendance. Mr Rogueda thanked Officers for a second opportunity to work together to find the best solutions regarding Crescent House. He stated that he supported the work to date on the windows and stated that the work was first proposed 22 years ago. He stated the residents' request in 2022 to repair and not replace the windows was supported and instead, vacuum glazing had been incorporated into the proposal. He informed Members that the residents were attending in the same spirit of co-operation. He raised concerns that the current application was for substantial work which would lead to major disruptions to residents lives, with residents having to leave their properties and remove their belongings for a minimum of three months, with some residents becoming homeless. He stated that the works would be costly to the leaseholders in excess of £100,000 per flat which was about 25% of the current market value of the flats.

Mr Rogueda stated that the duration of the project was planned to be in excess of six years. He informed the Sub-Committee that he was objecting to the planning application not because he did not want the repairs and new glazing to proceed, but because he was requesting conditions be added.

Mr Rogueda stated that no decision should be taken before the pilot project was completed. He informed Members that the planned repairs to the oriel windows had not been completed and testing of the ventilation had not been carried out. He added that the original internal beading of windows had been destroyed and replaced and the kitchen roof had not been repaired. Also, a series of tests critical to inform the current application and specifically requested by Mr Edwards would only be taking place in the following week. He stated that this project was not finished and the current application should therefore not proceed.

In relation to the frames and frame elements, Mr Rogueda stated that these must be retained as much as possible. He stated that there were deviations from that commitment on the windows of Flat 347 and that he had observed that the beading of the kitchen windows had been removed and the jalousie windows had been destroyed. He stated that in relation to the aluminium windows, there was no need to treat them or replace them.

Mr Graham Kern, resident of Crescent House and secure tenant stated that there had been a requirement for FINEO vacuum glazing to be tested on the pilot flat before glazing was chosen. He stated that Officers had advised that this could not be fitted in the round windows of the flats on the third floor. He also stated that the first and second floor windows did not have round windows nor toughened glass and therefore FINEO could be used. He stated that the third-floor flats could have a mix of FINEO and LandVac.

Mr Kern stated that all of the third-floor residents with jalousie windows in their bathrooms opposed to having them removed as proposed as this would make the flats more damp and also hotter in the summer. He stated that this would lead to legal infringement when the windows were removed, as this would be a breach of the grant of the lease of the leaseholders. Mr Kern stated that although the proposal claimed that the fenestration and subdivision and operation of fenestration would not change, it was proposed to remove the jalousie windows. He added that there was also a heritage issue with the windows an essential part of the design of the flats on the third floor, and they were integral to the grade two star listing, which must be respected. He stated that it was claimed that these windows were responsible for 18% of the heat losses from each flat but this was unproven.

Mr Kern stated that the current ventilation proposal was best removed at this stage or otherwise should be much better explained and tested before implementation. Also, as the ventilation would require drilling holes in concrete which would be highly disruptive, it should be optional in leasehold flats.

In relation to insulation, Mr Kern stated that aerogel and Rockwool were proposed for the soffit insulation. He stated that Rockwool was much thicker

than aerogel and would lead to significant changes to the appearance and aesthetic of the building. He added that aerogel was proposed for the parade of shops to protect the heritage and requested that aerogel be used for the whole soffit as proposed by the conservation area consultee.

Mr Kern stated that although it was proposed to replace the roof insulation, there was no evidence that the roof insulation was faulty. He added that insulation over the kitchen flat roofs was required and that this work was meant to be carried out during the pilot project but had not yet been started.

Mr Kern stated that no repairs were proposed to the oriel windows to avoid water dripping onto the façade, eroding the facade and future water damage. He requested that a design proposal be included to protect the oriel windows and stated that work was also meant to take place during the pilot project but had not been done.

Deputy King informed the Sub-Committee that after general discussions with residents, she considered there were technical issues that could possibly be addressed via conditions. She thanked the applicants for all their hard work on this important project on a Grade II* listed building that welcomed many visitors to the City of London. She also thanked them for engaging with and listening to the residents who not only had intimate knowledge of how the building performed, but had also brought their time, money and professional expertise to this project. She stated that the only reason vacuum glazing was now the accepted approach was as a result of the research undertaken by the residents.

Deputy King raised residents' concerns about the refurbished aluminium frame and stated that the finish was not good and detracted from the overall success, the window had no thermal break and would be a condensation source and need wiping down not to damage the timber surround. It had not yet been thermally tested. She advised that research on a window with a thermal break had been undertaken and asked that the installation and additional testing during the rest of the winter months be included as part of the conditions. She also raised concerns that the metal frame would transmit sound and acoustics should be considered. Deputy King suggested that the remaining pilot period should be used to install a replacement window with a thermal break and improved acoustic performance if acceptable to residents and heritage organisations and achievable at a reasonable cost, and the results should then be compared.

Deputy King raised concern that the current ventilation proposal had not been tested in actual living conditions i.e. with curtains and with bathing and cooking taking place and this testing should be undertaken. Condition 14 referred to 12 months of tracking the performances of the flats, but any problems would have to be addressed retrospectively, at which point at least half the residents would have gone through the upheaval of decanting. She requested that this be de-risked as much as possible before the work started with tests carried out over the next few months with the flat occupied to verify the system.

Deputy King stated that some leaseholders wanted to keep their jalousie/louvre windows which was an issue only for the top floor. She understood this could negate the ventilation system as proposed and asked if there were any options for a window that opened in the bathrooms or the retention of the original windows.

Further concerns were raised about the roof and soffit of the oriel window not having insulation which was a floor 1 and top floor issue. Deputy King stated that the shedding of water was a current problem that did not seem to have been addressed and asked if it was possible to review the design of the roof and soffit to have a more holistic approach to prevent the damage recurring.

She requested that Members also on Community and Children's Services Committee and the Finance Committee push for as generous a payment system as possible to assist residents with the bills arising from this innovative and important project by the City of London Corporation.

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

A Member asked if the extra conditions or comments made by Deputy King would be taken into account. Deputy King stated she hoped the issues raised would be addressed.

The Chairman invited the supporters of the scheme and the applicant, to speak. Ms Gaby Robertshaw stated that she had lived in Crescent House since last year, and that Crescent House, along with the whole of the Golden Lane Estate, had a creative community.

Ms Robertshaw stated that the proposal would see the leaseholders asked for life changing sums of money. She informed Members that over 50% of all residents taking part in the consultation questionnaire and over half of the residents, tenants and leaseholders had lived there for over 10 years. This project had brought neighbours together, residents had pooled their talents and meetings were arranged. The 60th anniversary had been marked with open house tours inside and out. Residents' points had been taken into account in relation to the pilot flat application. Ms Robertshaw stated that the proposed project would be the largest residential restoration project in Europe to use vacuum double glazing.

Ms Robertshaw stated that almost five years ago, the Corporation had undertaken concrete repairs to Crescent House. She commented that the report stated that the Corporation intended to carry out investigations into specialist cleaning for the façade. She stated that stripes on the concrete meant it was essential not to delay the cleaning and requested that concrete cleaning be conditioned. She stated it had been 20 years since any major maintenance took place and residents had waited more than 10 years for the windows project to come to fruition. Ms Robertshaw stated that Crescent House was in the heart of the culture mile and was a gateway building into the City of London, as such the project required a linked approach. She added that the application resolved many of the problems.

Mr Jason Hayes, Senior Surveyor, Community and Children's Services Department, on behalf of the applicant, stated that the proposals in the application aimed to achieve a balance between following the listed building management guidelines to retain and respect the historic fabric of the building and make sensitive performance upgrades to the windows.

Mr Hayes informed Members that this project started first and foremost as a windows project and some of the changes had been the result of resident engagement. Listening to ideas and suggestions from residents of part of regular resident group meetings and positive engagement events over time, the project scope was expanded to include other works to improve the fabric of the building to help move towards a low carbon future and provide affordable social housing for Crescent House.

Members were informed that the pilot project in Flat 347 had given all stakeholders a valuable opportunity to assess the works proposed to the windows and this had been beneficial to the consideration of the application. It had enabled the support of Historic England and 20th Century Society to be secured. It had been demonstrated through testing and calculation that the proposals had significant impact on reducing heat loss and heating demand, improving air tightness and reducing the intrusion of the external noise. It had also allowed the continuation of the engagement with residents on the proposals.

The Sub-Committee were informed that the residents, tenants and leaseholders, both residents and non-residents of Crescent House had all been invited to view the completed project and the views were wide ranging, diverse and very welcome. Overall, there was general support for the works, but there was concern from a number of residents over some of the detail and there were differences in views of what the balance point between conservation and performance improvements should be.

The objectors had questioned the choice of manufacturing vacuum insulated glass. While this was not strictly part of the application, the team's preference of LandVac had been based on the following key points: 1) It could be manufactured to all of the sizes required to the existing window frames whereas the other options could not; 2) it had better thermal performance than the other options; 3) every sheet of the LandVac was fabricated from toughened glass and this was an important factor in reducing likelihood of breakage; 4) the supply of LandVac glass proved quicker and 5) it had fewer micro spaces.

Mr Hayes advised that the proposal sought to retain as much historic fabric as possible whilst improving performance. In the pilot project, the aluminium frame was removed, dismantled, cleaned, and re-anodised to protect the metal from further decay. As the metal was pock-marked, tarnished and weathered, the anodised finish would vary in appearance. The frame was reassembled with the vacuum glass incorporated along with the new rubber gasket. The new glass would improve the overall thermal performance of the window and would help to manage some of the condensation risk. However, it was not thermally broken. He added that the only way to achieve a full thermal break would be to

install a new window frame. BRE testing had demonstrated that only 5% of the air leakage from the home was through this frame. As part of the pilot project works the team would continue to investigate new thermally broken aluminium frames, so the heritage impacts and performance improvements to this alternative approach could be assessed.

Mr Hayes stated that the louvre window had been removed in the pilot project and the main application proposal. The BRE testing had demonstrated up to 20% of all the air leakage from the home was through this window when it was closed. The format of the window made it almost impossible to improve the airtightness or the overall thermal performance of the window. The team acknowledged that removing the louvre window would impact on the listed fabric, but to retain it would undermine the positive impacts and performance of the ventilation solution being applied. A ventilation solution was applied to manage humidity within the properties because condensation, damp and mould were major issues within the block and these required managing.

Members were informed that once completed, there would be ongoing cyclical maintenance inspection of the refurbished windows. Working with the specialists and contractors, the team would develop a maintenance plan and schedule. It would cover, in detail, when inspections and subsequent actions would be required to maintain the windows, including the finish and also components such as ironmongery and seals. Inspections work would be proactive and identify further repairs and would also include planning for access to the facade.

The Chairman asked Members if they had any questions of the supporter and applicant.

A Member asked if the suggestions made by Deputy King could be incorporated into conditions. The applicant stated that the team would look to complete investigations into the aluminium window. In addition, the water deflection of the oriel roof would be included within the main application. Although it had not yet been done within the pilot project, this would help deflect the water away from the main post in the bay window.

The Chairman asked for clarification as to whether all the conditions and variations raised by the objectors had been considered by the applicant in their evaluation before putting forward the application. The applicant stated that he understood the majority of the issues had been addressed in the report.

The applicant was asked if more could be learnt by monitoring the effectiveness of the project for longer. The applicant stated that monitoring the project and the performance of the improvements e.g., heat loss and noise transmission was required by condition for the 12 months from completion of the project. Environmental sensors could be used to sense humidity and temperature and prove that the improvements were working. The pilot project gave a unique learning experience and allowed performance to be tested and monitored. If it was possible, someone would live in the property for the next few months,

which would be the coldest time of the year to show the results on heat retention and ventilation.

A Member asked, if as an objector had stated, the programme would take 6 years and whether any delay to the programme would lead to significant deterioration in the frames, particularly the ones to be treated at the end of the programme. The applicant stated that the programme was still to be formalised with the contractor once the works had been tendered. Having contractors on site with the necessary skills would mean if any ad hoc repairs were required to the existing façade, these could be undertaken. It was likely that the windows in the worst condition would be repaired first. The maintenance regime would start once the works to the first flat had been completed. It was important to have the right competencies and skills in place for work to such a significant heritage building.

In response to questions about the length of the programme and how long residents would be out of their flats, the applicant stated that the time residents would be out of their flats would be dependent on the condition of the windows and the amount of work that was required. A more recent condition survey completed by a Royal Institute of Chartered Surveyors (RICS) surveyor, had provided an indication of the works required, however once the works began, more work could be found. It was important to communicate with residents throughout the work. Currently it was expected most residents would need to decant from their property for 4-5 weeks. The programme length would depend on the amount of skilled labour available for a heritage project such as this and also properties available within the community to use for decanting residents. Although it was intended to keep residents on the estate, void properties were not common.

In response to a question about the cost to each leaseholder, the Chairman stated that cost was not a material planning consideration.

In response to a Member's question about the oriel window and whether louvre windows could be optional, the applicant stated that investigation was taking place into the oriel windows. Regarding the louvre windows, the ventilation had to work with an airtight window but consideration would be given to whether an openable window could be installed. Air tightness would not be achieved with a louvre window as even when closed there was 20% air leakage from the home.

In response to a question about whether the system had been tested with a fan in another area, in order to save the louvres which were an integral part of the architecture, the applicant stated that the point that air was extracted varied from flat to flat and was largely determined by where the existing ducts that ran through Crescent House were located. In some homes it was pulling air from the bathroom, in others it was pulling air from the kitchen and in other homes, it was pulling air from both the kitchen and the bathroom. Wherever air was being pulled from, the louvre windows created a short circuit in the system as it was the easiest location for the intake of air. There was a concern that if the louvre was situated at the back of the property, that the ventilation system, even if it was pulling air from the kitchen, would not be pulling air efficiently from the

living and bedroom spaces and the air circulation would short circuit around the back of the flat. It was only by maintaining a relatively continuous air tightness in the kitchen and the bathroom that the system would be pulling air from the front facade of the building.

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

A Member raised concern about the use of the word 'opaque' in Condition 4 in relation to the glazing under the bookcase, and asked if it could also state that it should be glazed to match the existing glass in terms of performance. An Officer confirmed that the wording could be changed from 'opaque' to 'translucent'.

A Member welcomed the review of street lighting. She stated that street lights which were an integral parts of the façade did not work currently and some residents did not want them on as they were outside their windows. She requested that if renovated, and repaired so they could work, they were not switched on. An Officer stated that this would be covered as part of the lighting strategy required by this condition. It would be dealt with if and when that condition came forward.

In relation to the aluminium window and oriel window, a Member asked if these could be included under Condition 7 or Condition 8 as issues to be considered under relevant details. An Officer stated that these proposed amendments could not be made as this would be a material change to the scheme that was not part of the existing scheme and this would therefore require a consultation.

A Member requested that Condition 14 be amended to require that test results of the ventilation system during the occupation of the pilot project flat be received before ventilation works commenced. The Officer stated that this was embedded in Condition 14.

A Member referred to conditions suggested by Deputy King in an email and asked Officers if they had seen and considered these. An Officer stated that he had seen the email and informed Members of his response to the points raised. He stated that the aluminium pivot window was an original existing window and Officers considered that its retention and refurbishment was a conservation optimal outcome and that there might be variation in the finish of the said window but that was typical of these kinds of schemes and that full replacement of it for the listed building would not be as beneficial. The Officer stated that in terms of the thermal break or the thermal performance of the window, it could not be conditioned that the window be replaced as this was not part of the scheme. This would require a re-consultation as it would be a material change to the proposals.

In relation to acoustic performance, the Officer stated that the initial test that had been undertaken as part of the pilot project had indicated around a 50% reduction in noise transmission. In terms of using the remaining pilot period to install a replacement window, the Officer stated that the physical works of the pilot had been completed. As outlined, it was not possible to condition and

require the replacement of the aluminium window. The Officer stated that Condition 5 as amended in the addendum however, would allow for the replacement of the aluminium windows with details to be submitted if the windows are unable to be repaired.

In relation to ventilation and louvre windows, Officers considered that Condition 14 as recommended was suitable and allowed for appropriate post occupancy evaluation of the flats with people living in them so that a wider spectrum of information could be obtained to inform the rest of the project. The Officer stated that the retention of those jalousie and louvre windows would undermine the holistic approach to improve the thermal performance of the building envelope and could compromise the ventilation strategy that had been advanced. The demand-controlled hydroscopic ventilation system would pull the damp air through and out of the flat. If the louvre window was retained, it would create a point of weakness. Officers considered that the measures in place were appropriate both in respect of energy efficiency and ventilation performance, but also in respect to the listed building.

The Officer stated that in respect to the oriel windows, there were new sills proposed to the windows which were larger and protruded further to shed the water away from the facade. New lead flashing was also proposed to the window heads below the oriel roof to shed water away from the facade.

The Officer stated that insulation to the roof had been explored but it was deemed unsuitable for this quite prominent principle location due to the heritage impacts that could occur and the visual impact.

A Member had queried the Energy Performance Certificate (EPC) rating with the applicant and had been advised in one case it would go from an E to a D rating following the works and in another case, it would go from a D to a C rating. He requested that Officers follow up with the government as a lot of expensive positive work was taking place and there were concerns about the rating system if all this work only resulted in a D rating. He considered that this was an excellent opportunity concerning how much work was being done to use this as a case to the government to get the EPC calculation corrected. Officers stated that they were in discussions with the government on the EPC regime and they would raise this issue.

A Member referenced the balancing act of the listed building conservation elements of the scheme and ensuring original details were retained against these being homes and it being important they were warm and mould-free. She asked for confirmation that environmental health officers would be monitoring work to ensure that if issues arose, they could be rectified quickly. An Officer stated that Conditions 13 and 14 set out the required maintenance strategy and also the testing of the three pilot flats over the first year of their occupation would cover the points raised. The monitoring would allow for an understanding of any defects that might be caused by the new works and deal with them appropriately.

A Member asked if a proof of concept could be conditioned as if for any reason, the work did not result in improvements, there could be significant costs associated with retrofitting. An Officer raised concern that this would be a pre-commencement condition and would be exceptionally onerous to implement. He added that Officers considered that the testing that had already taken place and the rigorous conditions that were in place were sufficient to understand post completion results. The Officer clarified that Officers were not aware of any of the issues raised e.g. water ingress, being an issue in the pilot.

Seeing no further questions, the Chairman asked that Members now move to debate the application.

A Member stated that he had asked a number of technical questions of the applicants and had been impressed with their responses. He considered this to be an excellent scheme. He stated that when this was discussed last year, the applicants were requested to address ventilation along with insulation and air tightness and they had done this. He did not agree with a suggestion that ventilation holes be optional as this would create issues with damp and mould. He commended the applicant on the proposal to retain as much of the frames as possible.

A Member commented that this was a good scheme, there were numerous constraints with the Grade II * listed building here and he considered anything that caused further delay to be undesirable. He stated that he was in favour of the careful monitoring of the first flats to be converted, so that if any problems arose, these could be addressed and harm to the whole scheme would be limited. He considered this scheme to be the best possible outcome.

A Member stated that the material that residents had found in terms of the FINEO window glass had made a real difference to the scheme. Officers had listened to the technical expertise of the residents. The Member expressed disappointment about the aluminium window and the possibility that another application might have to be made. She stated that if this was the case and a sample was made and approved, this should be progressed quickly to avoid any further delays to the work.

A Member stated that her initial preference was for the replacement of all the windows and she still had concerns about repairing windows that had been in existence for so long, but she was happy to support this application. She stated that the applicant had taken into account the concerns of residents and this work would transform these homes.

A Member thanked the residents for bearing with the project for so long, and Officers for listening to and working with the residents. She stated that this dialogue with residents should be continued, working with residents to resolve any issues quickly.

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

Votes were cast as follows: IN FAVOUR – 14 votes
OPPOSED – None
There were no abstentions.

The recommendation was therefore carried unanimously.

RESOLVED –

That Planning Permission be granted for the above proposal in accordance with the details set out in the schedule attached to the Officer report.

5. **CRESCENT HOUSE GOLDEN LANE ESTATE LONDON EC1Y 0SL - LISTED BUILDING CONSENT**

The Sub-Committee considered a report of the Planning and Development Director regarding Crescent House Golden Lane Estate London EC1Y 0SL – Listed Building Consent for repairs and minor alterations to the existing windows and window framing at first, second and third floor levels of Crescent House, including: stripping, repairing and redecorating existing window frames; replacement of existing single-glazing with vacuum glazing panels; insulation works to the main concrete vaulted roof and first floor concrete soffit; and associated works.

The Committee voted on the recommendation alongside those set out under Agenda Item 4.

Having fully considered the application, the Committee proceeded to vote on the recommendation before them.

Votes were cast as follows: IN FAVOUR – 14 Votes
OPPOSED – None
There were no abstentions.

The recommendation was therefore carried.

RESOLVED –

That Listed Building Consent be granted for the above proposal in accordance with the details set out in the schedule attached to the Officer report.

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

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

RESOLVED – That the report be noted.

7. *** 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.

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

There were no questions.

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

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

The meeting ended at 4.10 pm

Chairman

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

Agenda Item 4

Committee:	Date:
Planning Applications Sub Committee	26 January 2024
Subject: 30 - 33 Minories And Writers House 13 Haydon Street London EC3N 1PE Demolition of existing building at 30-33 Minories and partial demolition of The Writers House and erection of a building comprising lower ground, one basement level and ground floor (with mezzanine) and 12 storeys above (69.005m AOD) for office use (Class E) and town centre uses (Classes E and Sui Generis). Refurbishment of Writers House, 13 Haydon Street for office use (Class E) and cultural/community uses (Classes F1, F2 and Sui Generis). Provision of new public realm, dedicated servicing bay, ancillary cycle parking and plant and other associated highway works.	Public
Ward: Tower	For Decision
Registered No: 23/00365/FULMAJ	Registered on: 23 May 2023
Conservation Area:	Listed Building: No

Summary

The site is located on the east side of the Minories, to the north of Haydon Street, south of St Clare Street and to the east of Mansell Street Guinness estate. The existing site comprises two buildings, namely St Clare House on 30- 33 Minores and Writers House on 13 Haydon Street.

Planning permission is sought for the demolition of existing building at 30-33 Minories and the erection of a building comprising lower ground, one basement level and ground floor (with mezzanine) and 12 storeys above (69.005m AOD) for office use (Class E) to the upper floors and town centre uses (Classes E and Sui Generis) at ground and basement level. The proposal would also involve the refurbishment of Writers House, 13 Haydon Street for office use (Class E) to the upper floors and cultural/community uses (Classes F1, F2 and Sui Generis) at ground and basement level. for the proposal also includes the provision of new public realm, dedicated servicing bay, ancillary cycle parking and plant and other associated highway works.

The scheme provides a significant uplift in flexible Grade A office floorspace (12,253sqm) and an increase in the number of full-time jobs (1,906 proposed full-time jobs). The proposed office floorplates are designed to be flexible to be subdivided and arranged in a number of ways to accommodate a range of office occupiers. Therefore, the proposed development would support the strategic objectives of the development plan and the emerging City Plan 2036. The economic benefits of the proposed development would be material and would weigh in favour of the proposed development.

The proposed development would also provide a maximum of 1,997sqm GIA of town centre uses (use classes E(a-d) (g(i)) and Sui Generis) including a mixture of retail, food and beverage and sports uses. Active retail frontage would be retained across the ground floor along Minories and Haydon Street. Therefore, the proposal would support the main function of City of London ("the City") and the aims of the development plan to support mix commercial uses within the office development which would contribute to the City's economy and character and also provide support for the businesses, workers and residents.

Part of the proposed development, following engagement with the local stakeholders, would involve the provision of a cultural/ community facility at lower ground and ground floors of Writers House, with affordable workspace to the upper floors. The proposal would utilise the ground floor for a combination of quiet working/studying space and areas for social interaction and activities and events for all age groups, whilst the lower ground floor would be used as a knowledge sharing and skills development area. A permanent display of archaeological artifacts is proposed at lower ground floor and a public art installation commissioned to local artists at the public open space (Sheppy Place). It is considered that the proposed development in Writers House would provide a new social, flexible, multi-use space suitable for a range of different uses to support the needs of the local residents and affordable workspace to the upper floors, which would fulfil the City's vision to providing inclusive workspace.

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 growth and would assist in the regeneration of the Aldgate Area as an attractive office, in accordance with the Local and London Plan Policies.

The disposition of the final massing and bulk has followed a design-led approach considering macro and local townscape impacts with multiple pre-

application negotiations to mitigate adverse impacts. In respect of massing, height and colouration, the development would appear as a complete city block which is broken down to match the existing urban grain of Minorities, respecting the scale of the neighbouring building, bedding it into existing context of height located around the Aldgate bus station. Materiality has been a central consideration. The facades would be well articulated and include an expressive richness of detail.

The building has been designed around the delivery of optimal microclimatic conditions, as well as creating opportunities for urban greening and accessible amenity spaces, such as Sheppy Place. The scheme would deliver an enhanced public realm, enhancing convenience, comfort and attractiveness in a manner which optimises active travel and the City's public realm objectives.

The proposal would preserve the ability to recognise and appreciate the Tower of London as a Strategically Important Landmark, in accordance with the associated visual management guidance on the LVMF. The extent of change the proposed development would have on the wider setting would be limited, the impact on the ability to appreciate the site's OUV would be neutral, and it would not harm the significance of the Tower of London whether in relation to the WHS, the individual listed buildings, or the Scheduled Monument. Overall, the proposals, by way of impact on setting, would preserve the heritage significance of heritage assets, and an appreciation of that significance.

The proposed development is in an area of archaeological interest, located above the 13th century abbey of St Clare's and within the eastern Roman cemetery. Part of the proposal is to extend the current lower ground floor into the car park area and excavate an additional basement across part of the site. These works, particularly the basement, are expected to have moderate to high impacts on archaeological assets. If during demolition, any remains of the abbey are found on the site, conditions are recommended to secure their preservation and display to the public if they demonstrate a good survival of legible structures. Furthermore, if following removal of the render of the western wall at Writers House, the known upstanding remains of the medieval Abbey of St Clare prove to be in good condition then conditions are recommended to require their conservation and display to the public. All of the above would be secured by condition and relevant planning obligations.

In term of public transport provision, the site has the highest level of public transport accessibility level (PTAL) of 6B.

305 long term and 22 short stay spaces bicycle spaces would be provided with associated shower and locker facilities. The scheme is in compliance with London Plan requirements for long stay parking, however it falls short in meeting the requirement for short stay parking. However, it is considered that additional areas for short stay parking would be able to be identified and this will be secured by condition.

Although the development would result in loss of public space along St Clare Steet, the space lost would be minimal and is currently unusable, due to the minimal width of the footway, being circa 0.2 metres, which effectively constitutes unusable space for pedestrian movement. To compensate the loss, the proposal would provide public space along Minories, which is considered more valuable due to the significantly higher footfall. Furthermore, it is considered that the overall impact of the proposal will have a net benefit to the public highway, due to the reduction of the car parking spaces and effectively the vehicle trips, the provision of consolidated servicing vehicle movements off-street for both Minories and Writers House, the provision of high quality long and short stay cycle parking and introduction of new public space to the north of Writers House (Sheppy Place). The alterations to the public highway would be secured through a S278 agreement.

No representations from Statutory Consultees objecting to the proposed development have been received. concerns were raised in relation to the lack of provision of a wheelchair accessible lift and accessible sanitary facilities for disabled people for the affordable workspace within Writers House. It is considered that subject to condition securing the provision of an accessible lift and sanitary facilities, these concerns regarding the provision of the highest level of accessibility and inclusivity can be overcome.

6 further letters of objection and a petition signed by 44 properties have been received from residents of the Guinness Estate, Marlyn Lodge and Fenchurch House, objecting mainly on the grounds of noise, disturbance, dust, overheating, residential amenity and loss of daylight and sunlight. Consideration has been given to all the material planning considerations raised and responses are provided in detail within the main body of the report. Certain elements of concern, such as noise, disturbance and residential amenity are to be addressed through conditions and relevant planning obligations.

With regard to impacts on daylight and sunlight, Fenchurch House (136-138 Minories) would experience Minor to Moderate Adverse effects, whilst the flats at 27 Minories would experience Major Adverse effects. Given the nature of rooms that are affected in 27 Minories (bedrooms and a kitchen/diner that also

benefits from other sources of daylight) and taking also into account position, relationship with the application site, orientation and context of development in the City, it is considered that, in these circumstances, the impact would not be detrimental to extent that would warrant refusal of the application on those grounds.

Overlooking impacts on neighbouring properties have been addressed through the design of the building and for the case of the identified impact on 27 Minorities, a condition will be imposed to ensure installation of obscure glazed windows to affecting elevation of the building.

The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.

Whilst the proposed development would result in full redevelopment of the building at 30-33 Minorities and therefore, in higher whole life-cycle carbon emissions compared to retention scenarios, alternative light and major refurbishment options were explored and they were also reviewed by a third-party expert, who confirmed that the optioneering has been carried out in compliance with the City Corporation's ("CoL") Carbon Options Guidance. It is considered that the redevelopment option would have the opportunity for greater floor to ceiling heights and an optimised structural grid layout throughout the whole development which would provide greater spatial and operational efficiency and offer higher quality and more flexible, grade A commercial office space, and it would result in the most effective use of the land. The redevelopment would also be able to offer additional, wider environmental benefits including significant uplift in greening and biodiversity, end of trip facilities supporting active travel, and greater climate resilience including reduced risk of overheating and flood risk, and therefore is considered to be the preferred long-term option.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the development plan when taken as a whole the proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

Paragraph 11 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving

development proposals that accord with an up to date development plan without delay.

It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and taking into account all material planning considerations, it is recommended that planning permission be granted subject to all the relevant conditions being applied and Section 106 obligations being entered into in order to secure public benefits and minimise the impact of the proposal.

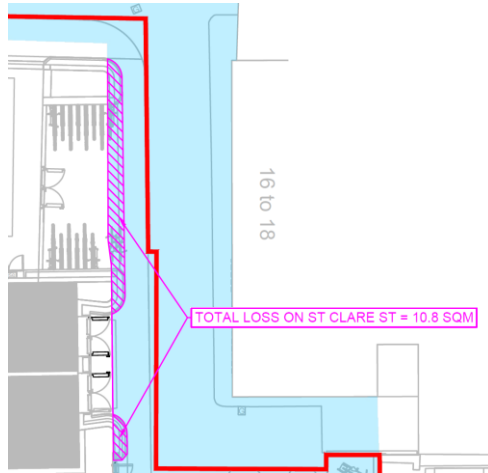
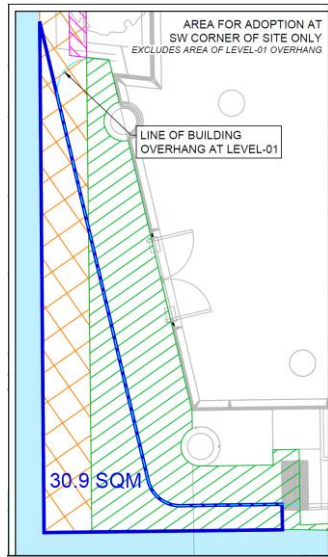
Recommendation

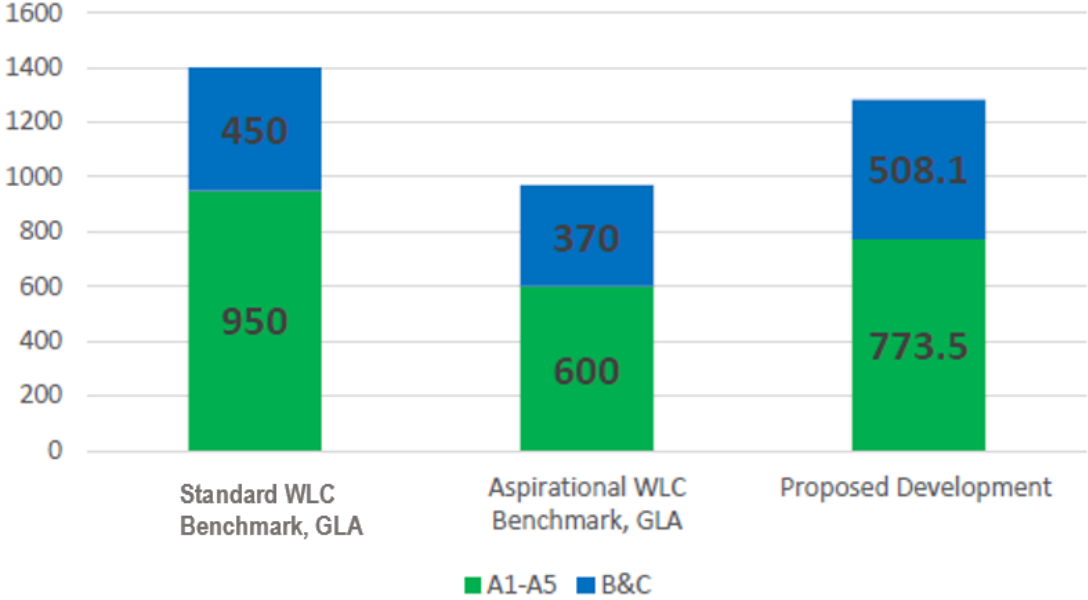
1. That, subject to the execution of a planning obligation or obligations in respect of the matters set out under the heading 'Planning Obligations' the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the 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 and any necessary agreements under Sections 278 and 38 of the Highway Act 1980 in respect of those matters set out in the report.

APPLICATION COVER SHEET

30 - 33 Minories and Writers House, 13 Haydon Street, London, EC3N 1PE

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	30 – 33 Minories – 65.907 AOD Writers House – 30.284 AOD		30 – 33 Minories – 69.005 AOD Writers House – 30.284 AOD	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Office	11,350 sqm	Office	23,603 sqm
	Restaurant and Café	402 sqm	Town centre Uses including Retail / Restaurant, Café and bar/ Leisure, Recreation and Fitness	1,099 sqm
			Town centre uses including Retail/Restaurant, Cafe and bar/ Leisure, Recreation and Fitness or Office	898sqm
	Drinking Establishments	810 sqm		
	Cultural / Community Use	0 sqm	Cultural/ Community Use	337 sqm
	TOTAL	12,562 sqm	TOTAL	25,937 sqm
			TOTAL UPLIFT:	13, 375 sqm
3. OFFICE PROVISION IN THE CAZ	Existing: 11,349 sqm Proposed: 23,603 sqm Office uplift: 12,253 sqm (51.9% uplift)			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	Estimated to be 1,007 employees based on recent tenancy data.		<p>During the demolition and construction period, there will be an average of 751 Full Time Equivalent (FTE) jobs provided per year on Site, assuming an even spend over the 3.5-year construction period. A further 248 jobs per year will be created as a result of the construction works off Site.</p> <p>The completed and operational Proposed Development will provide 1,867 FTE office jobs, 11 FTE Food and Beverage jobs, 13 FTE health and fitness jobs, 4 FTE retail jobs, and 11FTE cultural/community jobs. (Total of 1,906 FTE jobs)</p>	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	26 although only 15 now accessible due to addition of cycle parking and waste storage.	Car parking spaces	1 blue badge parking space to be secured by condition (reduction of 15 general parking bays)
	Cycle long stay	23	Cycle long stay	305 (policy compliant)
	Cycle short stay		Cycle short stay	22 (41 policy compliant short stay cycle parking to be provided subject to condition)
	Lockers	0	Lockers	293 (exceeding policy compliant requirements)
	Showers	0	Showers	29 (31 policy compliant showers to

	Changing facilities	0	Changing facilities	be provided subject to condition) Yes
6. HIGHWAY LOSS / GAIN	Net Change in Public Areas			
	<p>Total Loss: – 14.9sqm (10.8sqm Public Highway St Clare Street)</p> <p>Total Gain: + 210.5sqm including Sheppy Place (30.9sqm Public Highway Minories and Haydon Street)</p> <p>Net Change: +62.2sqm (+20.1sqm Public Highway)</p>			
				
7. PUBLIC REALM	<p>As detailed in the supporting Landscape Design and Access Statement, the Proposed Development introduces a high-quality public realm offer, through the provision of the following enhancements:</p> <ul style="list-style-type: none"> - New public courtyard, known as Sheppy Place, to the north of Writers House; - Creation of pocket space along St Clare Street; - Creation of footways adjacent to northern boundary of the site; - Widening of the footway along Minories and the corner with Haydon Street; - Streetside planting around the Site; and - New accessible route though the community floorspace of Writers House to connect from Haydon Street to Sheppy Place and St Clare Street. <p>Public realm gain: 210.5sqm (including Sheppy Place and widening of footway along Minories and Haydon Street)</p>			
8. STREET TREES	EXISTING		PROPOSED	
	0		0	
			<p>Raised planters proposed to Minories entrance and addition of trees to Sheppy Place.</p>	
9. SERVICING VEHICLE TRIPS	EXISTING		PROPOSED	
	<p>The delivery and servicing activity which currently takes place at the Site is a combination of on-site and on street including the existing Haydon Street car park.</p> <p>Precise quantum unknown.</p> <p>No Delivery and Servicing Management Plan, no consolidation or booking systems in Place.</p>		<p>On-site service yard at the northern edge of the site, with direct access from St Clare Street.</p> <p>All servicing for the site will now be conducted off Street Delivery and servicing Management Plan set as Condition. 30 trips a day predicted with consolidation measure.</p>	

10. SERVICING HOURS	It is proposed that vehicle borne delivery and servicing activity would be restricted to off-peak periods, with no servicing activity between 07:00-10:00, 12:00-14:00 and 16:00-19:00 in accordance with CoL policy.												
11. VOLUME OF RETAINED FABRIC	Overall – 0% volume retention (excluding retained Writers House)												
12. REGULATED OPERATIONAL CARBON SAVINGS	Improvements against Part L 2021 : 18% GLA requirement: (GLA acknowledges that 35% regulated carbon reduction is very challenging for non-residential schemes at present)												
13. OPERATIONAL CARBON EMISSION	Over 60 years absolute: Over 60 years per square meter: 758 kg CO ₂												
14. EMBODIED CARBON EMISSIONS	<p style="text-align: center;">Comparison with WLC Benchmarks by Stage in kgCO₂e/m² GIA A-C</p>  <table border="1" data-bbox="384 887 1477 1485"> <thead> <tr> <th>Benchmark</th> <th>A1-A5 (kgCO₂e/m²)</th> <th>B&C (kgCO₂e/m²)</th> </tr> </thead> <tbody> <tr> <td>Standard WLC Benchmark, GLA</td> <td>950</td> <td>450</td> </tr> <tr> <td>Aspirational WLC Benchmark, GLA</td> <td>600</td> <td>370</td> </tr> <tr> <td>Proposed Development</td> <td>773.5</td> <td>508.1</td> </tr> </tbody> </table> <p>Embodied Carbon:- life-cycle modules A1-A5 (Product and construction process stage)</p> <p>Total embodied carbon: 34,151 tonnes CO₂e (1,282 kgCO₂e per sqm)</p>	Benchmark	A1-A5 (kgCO ₂ e/m ²)	B&C (kgCO ₂ e/m ²)	Standard WLC Benchmark, GLA	950	450	Aspirational WLC Benchmark, GLA	600	370	Proposed Development	773.5	508.1
Benchmark	A1-A5 (kgCO ₂ e/m ²)	B&C (kgCO ₂ e/m ²)											
Standard WLC Benchmark, GLA	950	450											
Aspirational WLC Benchmark, GLA	600	370											
Proposed Development	773.5	508.1											
15. WHOLE LIFE CYCLE CARBON EMISSIONS	Total whole life-cycle carbon emissions: 54,418 tonnes CO₂ Total whole life-cycle carbon emissions per square meter: 2,043 tonnes CO₂/m²												

16. WHOLE LIFE-CYCLE CARBON OPTIONS

	Assessment 1 Minor refurbishment	Assessment 2 Major refurbishment with extension	Assessment 3 Redevelopment
Gross Internal area (GIA) m ²	15,289	24,862	26,647
Substructure % retained by mass	100	90	0
Superstructure % retained by mass (frame, upper floors, roof, stairs, ramps)	95	30	0
Upfront Embodied Carbon (A1-A5) (kgCO ₂ e/m ² GIA) <i>excl. sequestration</i>	351	563	778
In-use & End of Life Embodied Carbon (B-C) (kgCO ₂ e/m ² GIA) <i>excl. B6 & B7</i>	454	386	504
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO ₂ e/m ² GIA)	805	949	1,282
Fuel source	Electricity	Electricity	Electricity
Estimated Base Build* Operational Energy (EUI) (kWh/m ² /yr GIA)	88	38	40.6
Estimated Whole Building Operational Energy (EUI) (kWh/m ² /yr GIA)	172	85.4	92.8
Estimated Base Build* Operational Carbon for building lifetime (B6) (kgCO ₂ e/m ² GIA)	189	81.3	86.9
EPC rating	Minimum B	Not modelled, suggested: A	A (anticipated)
Total WLC Intensity (incl. B6 & pre-demolition) (kgCO ₂ e/m ² GIA) <i>Module B7 is not considered</i>	994	1,030	1,369
Upfront Embodied carbon (A1-A5) (tCO ₂ e)	5,366	13,997	20,731
In-use embodied carbon (B-C) (tCO ₂ e)	6,941	9,597	13,430
Operational Carbon for building lifetime (B6) (tCO ₂ e)	2,890	2,020	2,313
Total WLC (incl. B6 and pre-demolition) (tCO ₂ e) <i>Module B7 is not considered</i>	15,198	25,614	36,475
*base build (landlord supply) refers to a broader range of energy sources than Part L 'unregulated' energy and excludes tenant energy use			

17. TARGET BREEAM RATING



Aspiring to Outstanding (policy target Excellent or Outstanding)

18. URBAN GREENING FACTOR

UGF: **0.3 – 0.34** (using the Lodon Plan and CoL factors respectively)

19. AIR QUALITY

Air Quality Assessment states that in compliance with the London Plan’s requirements, the proposed development would be **air quality neutral** in terms of both building and transport related emissions.

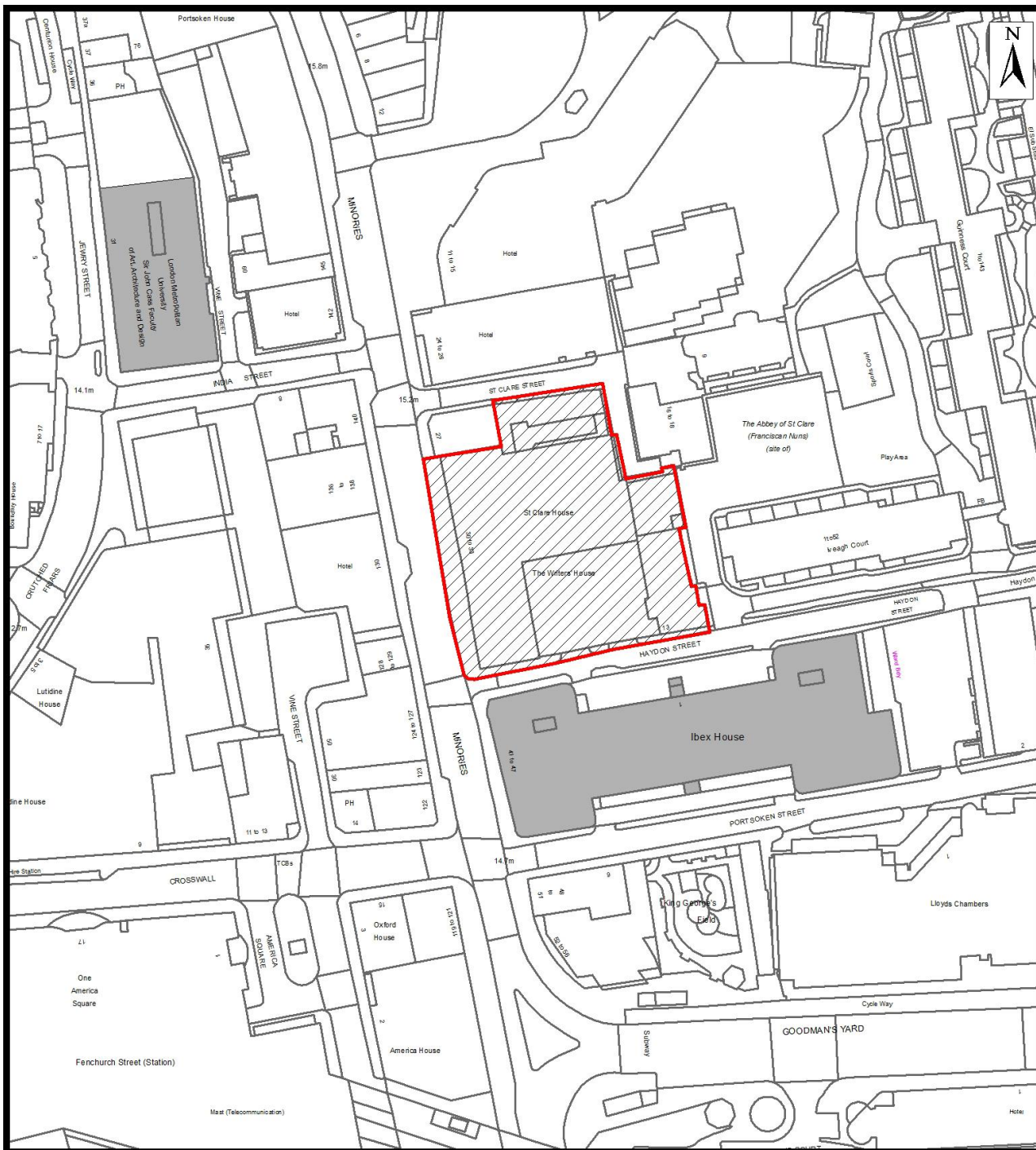
The proposed development would be car-free, with the exception of a blue badge parking space, which will be secured by condition.

The development would not include any centralised combustion plant or gas boiler. It will only have life safety diesel generator and diesel pump for commercial sprinkler system.

20. Biodiversity
Net Gain

1645.37% (the habitat units value would increase from 0.02 to 0.35)

Site Location Plan



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ADDRESS:
30 Minories

CASE No.
23/00365/FULMAJ

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



ENVIRONMENT DEPARTMENT



Figure 1: View from Minories towards northeast (Application site)



Figure 2: Photo: View from Ibex House towards northwest (30-33 Minories and Writers House)



Figure 3: View from St Clare Street towards southwest (Application site)



Figure 4: Writers House



Figure 5: View of the application site from the west towards the east

Main Report

Site and Surroundings

1. The site is located on the east side of the Minories, to the north of Haydon Street and south of St Clare Street. The site to the east abuts the Mansell Street Guinness residential estate. The site comprises two existing buildings, St Clare House on 30-33 Minories and Writers House on 13 Haydon Street.
2. The proposal site is located in the eastern edge of the City of London near the boundary with the London Borough of Tower Hamlets. The site is not located within a Conservation Area, but it is located within the backdrop of views of the Tower of London World Heritage Site from Queen's Walk and Tower Bridge.
3. Historically the site and surroundings were occupied by Victorian warehouses associated with the arrival of a railway line terminating at Fenchurch Street. The townscape context of the locality is of a varied scale and character.
4. St Clare House has a T-shaped floor plan with a 5-storey block which fronts onto Minories and a 13-storey element to the rear. The building underwent a comprehensive refurbishment in 2000 and the tower element was re-clad in grey and white panels while the 5-storey block retained its 1950's appearance, of brown brick, white cement window frames and stone clad columns.
5. St Clare House comprises leisure (food and beverage) uses at ground floor with office above. There are three retail units (total of 1,212sqm GIA) at ground floor and basement level the rest of the building comprises offices, with a total floor area of 10,278sqm (GIA). The spaces either side of the tower at the rear of the building are used as a service yard and car park.
6. Writes House is a Victorian former warehouse building of two main storeys over ground and lower ground floor plus attic. It has been identified as a non-designated heritage asset due to its architectural, historic and archaeological interest.
7. The site has a coarser urban grain compared to the western side of Minories. Ground level retail uses to Minories provide little street presence due to the significant level difference between street level and the internal finish floor level. The open space is poor quality and, overall, the building underperforms for such a busy and active location close to internationally

significant heritage assets. The elevations of St Clare House are equally uninspiring with the monotonous façade fronting Minories and the low quality dated cladding treatment to the tower. Writers House, also within the development site is not directly linked St Clare House. Writers House provides little active frontage to Haydon Street due to the significant level change from street level, no level access is provided from Haydon Street currently.

8. To the northwest the site abuts the Three Lords public house, which contains a public house at ground floor and residential units above. Immediately to the south of the site is IbeX House, built in 1937 and a grade II listed building.
9. The site is located within the Roman Eastern Cemetery and is partly on the site of the medieval Abbey of St Clare, and is therefore of high archaeological sensitivity.
10. Minories is a broad thoroughfare lined with commercial buildings of predominantly six to eight storeys with varied architectural character. To the north east there is a group of higher consented and implemented schemes around the Aldgate Bus Station. Despite the architectural diversity of the street there is a consistency of ground floor heights and treatments and human-scale character.
11. The area surrounding the site is mixed-use in character, comprising office, retail, leisure, hotel and residential uses. The Motel One and Hilton hotels are located to the north of the site, and the Chamberlain hotel lies to the west. As noted above, there are residential uses immediately to the east of the site and to the northeast The Haydon block of flats is nearing completion.
12. The site benefits from having a PTAL rating of 6b. It sits in close proximity to Aldgate and Tower Hill London Underground Stations, London Fenchurch Street National Rail Station and Tower Gateway DLR Station. This area of London is also very well served by bus routes on Minories, Aldgate High Street and Mansell Street. Five Cycle Hire Stations are also located within walking distance from the site.
13. Topographically the area gently slopes downwards to the southeast and there is a pronounced change in level downwards between Minories and Haydon Street.

Proposals

14. Planning permission is sought for the demolition of existing building at 30-33 Minories and refurbishment of Writers House and the erection of a building comprising lower ground, one basement level and ground floor (with mezzanine) and 12 storeys above (69.005m AOD) for office use (Class E) to the upper floors and town centre uses (Classes E and Sui Generis) at ground and basement level. The proposal would also involve the refurbishment of Writers House, 13 Haydon Street for office use (Class E) to the upper floors and cultural/community uses (Classes F1, F2 and Sui Generis) at ground and basement level. Permission is also sought for the provision of new public realm, dedicated servicing bay, ancillary cycle parking and plant and other associated highway works.
15. The scheme would provide 25,937 sq.m GIA floorspace, comprising:
 - 23,603 sq.m of office floorspace (Class E(g(i)));
 - 1,099 sq.m of flexible town centre uses (Class E(a-d) and Sui Generis)
 - 898 sq.m of flexible town centre uses (Class E(a-d) (g(i)) and Sui Generis); and
 - 337 sq.m of Cultural/community use (Class F1(a-e)/F2(b) and Sui Generis).
16. The scheme would provide a significant amount of flexible Grade A office floorspace – an uplift on the site of both quality and quantity of office floorspace – and an increase in the floorspace for the proposed town centre uses. The development would also provide new floorspace for community uses and cultural provision and affordable workspace proposed within Writers House.
17. The proposed development would involve two elements, namely the retention and extension of the Writers House and the full redevelopment of St Clare House to a maximum height of 69m AOD.
18. Writers House would be retained, with the lower levels reconfigured and refurbished to provide community/culture space. Its upper levels would provide affordable working space for small to medium enterprises and individuals. The ground and lower grounds would be used for educational and community spaces and for permanent display of archaeological remains and artefacts.
19. The main entrance to Writers House is located on Haydon Street, however, due to the level change of nearly 2 metres, across its footprint, there is no level access from Haydon Street but there is from Sheppy Place to the rear. It is proposed to lower the southern end of the upper ground floor to slab level to provide level access from Haydon Street. A platform lift is also proposed to be installed to provide accessibility to both upper and lower ground levels. The ground floor windows would be

elongated to road level providing an active frontage and sightlines through to Sheppy Place. The existing metal staircase to the rear is proposed to be retained and utilised for fire escape.

20. Sheppy Place is proposed to be landscaped and transformed to a publicly accessible square. Outdoor seating is proposed and to be installed and soft landscaping to be planted. Sheffield cycle stands are proposed to be installed on the northeast section of the courtyard to be used for short stay cycle parking. The brick boundary wall along the eastern boundary with Mansell Street Estate is proposed to be retained.
21. Other public realm improvement would include the enlargement of the pavements on Minories, with integrated seating and landscaping, setting back of the building line at ground level on the southeast corner on between Minories and Haydon Street and greening on escaped route to the north of the building between the application site and 'The Three Lords' pub to the northwest.
22. The new building at 30-33 Minories would be mixed use at ground and basement levels with a central office lobby on Minories providing access to the office floors above and through to Sheppy Place to the rear. On either side of the ground floor there would be commercial units as well as a smaller one fronting Sheppy Place. To the south a larger flexible unit is proposed to be created, which would potentially accommodate retail, restaurants/café, leisure, recreational, fitness or office uses. Access to cycle parking is proposed immediately adjacent to that unit and between that and Writers House. The main core of the building would be located centrally, whilst servicing facilities will be located to the north, onto St Clare Street. A landscaped fire escape route is proposed to the north adjacent to The Three Lords public house.
23. A typical office floor would be arranged around the central core. The core accommodates 5 passenger lifts, two goods lifts and two firefighting stairs. Welfare facilities are provided at each floor. The two basement levels, of which a significant amount of structure would be retained, accommodate the main plantroom areas, in addition to the on-floor air handling units. Cycle parking and end of trip facilities are also located at basement level. The section of the lower ground level adjacent to Minories is also proposed to accommodate town centre uses.
24. In respect of massing and design, the new building would be read as distinct but connected buildings, with a primary elevation of terraced, faience-clad blocks to Minories and a more subservient, lower-scale and brick-clad series of elevations to Haydon Street. The building's maximum height would be reached at the north-east corner and would align with the existing heights of the hotels there.

25. The ground floor along Minories would respond to the ground floor height of immediately adjacent public house to the north and Ibex House to the south, with the office entrance elevation to double storey height. The elevational design of the building changes along Haydon Street to introduce warehouse typology finishing materials, to respond to the finishing materials of Writers House and also dropped in height. The main corners of the building blocks are rounded with floor to ceiling windows elevation, divided by ornamental spandrels.
26. The materiality of the proposed development is based on a blue/green matt glazed brick module, introducing subtle colour variation at each floor. The colouration on Heydon Street proposed to be linked with Writers House and Ibex House and is matt brick colours selected from buff/orange hues. The base of the building along Minories would have a different finish from the upper floors, finished in buff matt brick. Signage would be incorporated on the brick pillars and the glazing.
27. In terms of urban greening, the site incorporates several green roof terraces finished with a one-metre-deep planted parapet, which are accessible, except for the top (above 12th floor) roof terraces, and balconies with 55cm-wide planters, achieving an urban greening factor score of 0.3 when using the GLA factors and 0.34 when using the City of London factors.
28. It is noted that following discussion with the applicant, the following amendments have been incorporated to the proposed development:
 - The variation in the coloration in the building has been simplified to designate the base, the middle and the top.
 - The coloration of the balconies has been amended to visually reduce their prominence.

Consultations

Statement of Community Involvement

29. The Applicants have submitted a Statement of Community Involvement dated March 2023 outlining their engagement with stakeholders. Public consultation took place via a dedicated project website, virtual meetings, in-person meetings and two in-person exhibitions. An advertised telephone number and dedicated email address were provided on all engagement materials. Translation services into Bengali were available throughout the consultation period, including the presence of an interpreter at the public exhibitions.

30. A flyer was distributed to 834 addresses on 10th November 2022 which advertised the consultation website, in-person exhibitions and provided contact details. The Applicant then hosted two in-person exhibitions at Writers House, 13 Haydon Street on Wednesday 16th November 2022 between 16.30 and 19.30 and Saturday 19th November 2022 between 11.00 and 14.00.
31. In addition, AND London hosted a “Community Day” at Writer’s House on Wednesday 17th August 2022 and a further one on Saturday 15th October 2022 which was also attended by representatives from PATRIZIA, Morgan Capital, PLP, and Kanda. The events were attended by 75 Guinness Estate residents of all ages in August and 69 in October. This provided the opportunity to introduce the local community to the scheme and plans for community floorspace at Writer’s House.
32. AND London also undertook door-to-door consultation on the Guinness Estate on the 21st July, 12th August, 10th October and 14th October. On each door-knocking exercise over 30 residents were engaged in discussions regarding their hopes for any new developments, and their requests for community benefits.
33. The dedicated public website offered information on the proposals and included an online public consultation that was open between 9th November 2022 and 2nd December 2022 enabling stakeholders and local residents the opportunity to provide feedback. In total, the consultation website was visited 240 times by 41 unique visitors during the consultation period and following the in-person exhibition. The online feedback form was completed 3 times.
34. Meetings were held with the Aldgate Connect Business Improvement District Manager on 26th August 2022 and with Portsoken Ward members on 11th November 2022.
35. The Statement of Community Involvement concludes that the feedback received throughout the consultation period has been largely positive with consultees particularly welcoming the proposals to provide space at Writer’s House for a mix of community uses including community space and affordable workspace. The conversations that have taken place through the consultation have largely focussed on the potential community uses for Writer’s House, construction management, height and massing and daylight and sunlight.

Statutory Consultation

36. Following receipt of the application, it has been advertised on site and in the press and has been consulted upon in accordance with article 15 of the Development Management Procedure Order (as amended). Copies of all received letter and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.
37. The applicant has provided detailed responses to matters raised in consultee and third-party responses. The applicant's responses are attached in full and appended to this report.

Consultation responses	
Historic England	Historic England has not commented upon this application. They state that Historic England provides advice when their engagement can add most value. In this case they are not offering advice. This should not be interpreted as comment on the merits of the application.
GLAAS, Historic England Archaeology (two responses dated 27 th June 2023 and 29 th November 2023)	<p>GLAAS initially recommended that the decision was deferred for further discussion of archaeological mitigation (in their letter dated 27th June 2023).</p> <p>Their further response (dated 29th November 2023) recommends archaeological conditions.</p> <p>They comment that the proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.</p> <p>The site is located above the 13th century abbey of St Clare's (Poor Clares or <i>sorores minores</i> from which Minorities takes its name) and also within Londinium's eastern Roman cemetery. Important glass working remains of post-medieval date are also present in the vicinity of the site.</p> <p>An archaeological desk-based assessment (MOLA 2023) and archaeological evaluation (MOLA 2022) have been carried out for the site. The evaluation demonstrated that remains relating to the abbey and burials from the cemetery survive on the site in the current car park area. Records from the 1950s confirm that Roman burials were found on the site during the construction of the current building. The</p>

	<p>current lower ground floor could not be evaluated in advance of development, but comparable levels of archaeology suggest that remains similar to those found in the car park are also likely to survive beneath the lower ground floor slab. The remains of the abbey so far identified suggest that floors and upstanding walls of the abbey have been removed and only below ground foundations survive across the majority of the site.</p> <p>The evaluation also removed the render in three areas against the extant western wall of the Writer's House. Excavations within the Writer's house in the 1980s had identified that some of the abbey walls had been reused during the construction of the building in the 19th century. The evaluation work confirmed that medieval masonry was extant, possibly to first floor height within the western elevation of the Writer's House, beneath the modern render.</p> <p>It is proposed to extend the current lower ground floor into the car park area and excavate an additional basement across the site. The extension of the lower ground floor will have a finished floor level of 11.4 OD, similar to the level of the current lower ground floor level. The new basement will have a finished floor level of 6.6m. No removal of historic fabric is proposed for the Writer' House. Archaeological remains of the abbey and the cemetery were identified at c.10.70m OD. It is likely therefore that the construction of the new lower ground floor will have a moderate impact on the archaeological remains and that the new basement will have a high impact.</p> <p>Whilst the Roman cemetery is of high significance, it covers a fairly large area of this part of the City and archaeological excavation of the remains within the site will enhance our understanding of the cemetery. St Clare's abbey is not well understood, and previous excavations have not been fully reported on. Although there are other abbeys dedicated to the Poor Clares in England, this type of community of female friars is relatively unusual. The below ground remains of the abbey are likely to be fragmentary and have been truncated by both the current building and by 19th century basements, thus reducing their otherwise high significance. However, the remains in the current lower ground floor have not yet been examined and survival may be better. The proposed development should therefore allow for any ruins of the abbey that are located within the footprint of the current lower ground floor and car park to be displayed to the public if they demonstrate a good survival of legible structures. Appropriate methods for preservation in situ of these remains should be provided.</p>
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We also recommend that where there known upstanding remains of the abbey, within the walls of the Writer's House, these remains are deemed to be of national significance, as they would have been experienced every day by the occupants of the abbey in a way that the foundations would not have been experienced. Modern render has been used to cover the upstanding medieval walls externally. This render should be removed by a conservation specialist and advice sought on whether the render should be replaced with something more sympathetic, prior to the western wall elevation becoming inaccessible once the new building is constructed. If, once the render is removed, the wall proves to be in good condition then it should be displayed to the public as part of the new scheme, either in Writer's House or in the new building to the west.

It is clear that the proposed development will cause some harm to archaeology. This harm can be minimised through foundation redesign where appropriate and partly compensated for by an enhanced programme of public benefit. A programme of public benefit regarding the heritage of the site has been proposed in the Cultural Plan and is very welcome. The site provides a good opportunity to enhance understanding of the eastern cemetery but also to tell the story of the Poor Clares and provide interpretation relating to the abbey. A number of public benefit proposals should therefore be secured by condition, including, but not limited to:

- full excavation of the remains of the abbey and cemetery in areas of proposed impact
- exposure and display of the abbey walls within the Writer's House or the new building to the west
- a synthesis of previous excavations of the abbey to be included within the reporting for the proposed archaeological excavation works within the new basement
- provision of open days and tours of the excavation whilst in progress, particularly reaching out to local communities
- provision of exhibitions of the finds from the site and nearby sites at the Writer's House
- interpretation boards within the new development
- information about the excavation provided on the hoarding during the work
- educational outreach
- if discovered, display of well-preserved

	<p>structural remains of the abbey within the new development</p> <ul style="list-style-type: none"> • preservation of the displayed remains in situ with appropriate monitoring and maintenance. <p><u>Recommendations</u></p> <p>Advise that the development could cause harm to archaeological remains and further archaeological work on the site should be secured by conditions. Conditions recommended to secure the above.</p> <p>Officer response: This matter is addressed in the Archaeology section of the report below.</p>
<p>Transport for London</p>	<p>The site of the proposed demolition is on A1211 Minories Road, which forms part of the Strategic Road Network (SRN). TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The site of the proposed 12 storey building is located less than 40m from A1211 Minories Road which as aforementioned forms part of the SRN.</p> <p>Access</p> <p>Pedestrian and cyclist access proposed from St Clare Street, Haydon Street and Minories, where dedicated access points into the building would be provided. The site has a PTAL rating of 6b which is the highest rating indicating that the Site has excellent public transport accessibility. At present the cobbled yard which will become Sheppy Place can be used for vehicle turning. It is not clear how its redevelopment will impact vehicular access requirements at 16-18 St Clare Street or Emergency access requirements. This should be clarified, and the proposals amended if necessary.</p> <p>Cycle Parking</p> <p>The overall quantity of cycle parking is in line with Policy T5 and should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards (LCDS). We would prefer the Writers House long stay provision to be accommodated within the main cycle store as this would be more convenient to users who would then also have access to the full range of proposed facilities.</p> <p>Car Parking</p> <p>TfL welcomes the proposed car free nature of the development in accordance with London Plan policy T6 (Car Parking) part B and T6.2 (Office Parking) Part B. However, it is not evident that Blue Badge parking has been provided in</p>

	<p>accordance with Policy T6.5 Non-residential disabled persons parking, paragraph 10.6.23. We would like to understand the arrangements for how employee blue badge requirements would be met and managed. We would note that if the proposed cycle parking in the service yard were to be relocated (see above) then blue badge provision could be made on-site and request that this is investigated further.</p> <p>Delivery and servicing</p> <p>Delivery and servicing is proposed to take place off street from an onsite servicing yard which is welcomed in line with policy T7 (Deliveries, servicing and construction) part G. Delivery and servicing is proposed to take place via St Clare Street. TfL would support the securing of the proposed Secure Use of off-site consolidation centre strategy by condition.</p> <p>Trip Generation and Impact</p> <p>TfL would not support the presented trip generation, and the TA has not provided any baseline information or assessment of the Healthy Streets indicators when assessing development impact. TfL considers the main development impact will increase pedestrian flows on the Minories towards nearby railway stations, with increased use of the Cycle network in the future. Accordingly, TfL would support contributions for public realm and cycling improvements for routes to Liverpool Street, Fenchurch Street, Tower Gateway and Aldgate East as a minimum.</p> <p>Construction</p> <p>The footway and carriageway on the A1211 Minories Road should not be blocked during the demolition and construction associated with the proposed development. Temporary obstructions during the conversion should be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the A1211 Minories Road. All vehicles should only park/ stop at permitted locations and within the time periods permitted by existing on-street restrictions. The Construction Logistics Plan (CLP) should be secured through the appropriate planning condition. (LU+DLR)</p> <p>Infrastructure Protection</p> <p>Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to</p>
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	<p>London Underground railway infrastructure. Therefore, we request that the grant of planning permission be subject to the separate numbered conditions to be discharged in a phased manner as and when they are completed.</p> <p>TfL request the above points answered before application determined.</p> <p>Officer response: Consideration of these impacts are contained in the following section later in the report: Highways and Transportation.</p>
London Underground	<p>No objection in principle, however, there are a number of potential constraints on the redevelopment of a site situated close to London Underground railway infrastructure. Therefore, request that the grant of planning permission be subject to conditions.</p>
Active Travel England	<p>Given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England will not be providing detailed comments on development proposals in Greater London at the current time. They refer to the local planning authority standing advice note, which recommends that TfL are consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London.</p>
Historic Royal Palaces	<p>They comment that whilst they regret that the proposed new development remains in the Strategic Views from Queen's Walk and the opportunity is not taken to improve the setting of the World Heritage Site with a lower development, the harm is no more than the existing buildings on the site and so no objection is raised.</p> <p>Officer Response: noted.</p>
The City of London Archaeological Trust	<p>The proposed development will require excavation of the basement of 30-33 Haydon Street of 1957 which forms the west side of the site and the refurbishment of Writers' House, a 19th-century building at 13 Haydon Street, to the east of it.</p> <p>Small scale recording has taken place at several points over the site in 1957 and since. These have uncovered Roman burials, some with associated finds in them, part of the large Roman cemetery east of Aldgate hereabouts; a stone sarcophagus was seen during works for the present building in 1957. A spectacular Roman stone sculpture of an eagle, presumably from a tomb, was found nearby at 24-26 Minories in 2013, and is to form part of the future Roman gallery in the new London Museum.</p> <p>The site falls within the precinct of the Abbey of the</p>

	<p>Minoresses (the sisters of St Clare), founded in 1294. Fragments of medieval walls, an archway and a stair have been recorded in the walls of Writers' House. Part of a wall is encased within the west elevation of the building, recorded in 1986 as surviving up to first-floor level. Other fragments of medieval and post-medieval walls have also been recorded, for instance in the 19th century under what is now the car park east of the development site. In 1918 it was held that medieval foundations were under walls on the south and east sides of Haydon Square. The east end of the church has been seen, outside the site to the northeast. The development site is mostly over the west or public part of the precinct, though according to reconstruction of medieval building lines the west end of the church falls inside the north-east corner of the site; it has probably been largely destroyed, but should be looked out for. There will probably also be remains of post-medieval buildings at risk which should be recorded; they would show how the abbey buildings were adapted in the 16th and 17th centuries, a topic little known in the City.</p> <p>The nature of destruction from piles and their caps below 30-33 Haydon Street is presently unknown, but the archaeological strata will survive between the caps here, and to a depth of 2m – 2.5m. Archaeological evaluation of the car park fronting Haydon Street in 2022 (MHY22) found strata to a depth of 1.4m, including what is probably a Roman burial, and fragments of medieval and post-medieval walls.</p> <p>The buildings of St Clare's Abbey have never been properly studied as a whole, and this project provides an opportunity to reconstruct what is known of an important suburban religious house.</p> <p>CoLAT recommends that the approach and suggestions of MOLA in their assessment should be followed. Further, the advice of Historic England in their letter of 27 June 2023 advises "Defer decision for further discussion of archaeological mitigation"; which we also urge.</p> <p>The archaeological work can be divided into two areas, (a) the majority of the site apart from Writer's House (13 Haydon Street); and (b) the brick building of Writer's House, which is to be refurbished.</p> <p>For part (a), it would be of great assistance to obtain a detailed plan of the expected piled foundations of the current building of 30-33 Minories. This could be ascertained of site by a programme of small-scale opening up of the basement floor. This would be of assistance of all parties. Other pre-</p>
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	<p>determination work can be discussed and carried out with MOLA. Evaluation is necessary in the 1957 basement to understand the survival of archaeological strata here as well as disturbance by existing foundations. In the future it is certain that an excavation will eventually be required within the footprint of the intended basement of 30-33 Minories, and this would be an important one within the study of the Roman and later City of London.</p> <p>For part (b), the refurbishment of Writer's House, the medieval work within the walls should be mapped if possible, but not disturbed. If however medieval work is exposed in any intervention, it should be recorded, conserved and displayed. The display should be put into context with signage, text and illustrations to bring out the historic character and significance of the site within the Abbey.</p> <p>In conclusion, therefore, CoLAT suggests that more pre-determination exploration of the site is required: more information on the piling arrangement in the building of 1957, and exploration to ascertain the extent and character of medieval walling within Writers House. Further archaeological evaluation is required to understand the archaeological aspects.</p> <p>Officer Response: Noted – these comments are addressed in the Archaeology section of the report below.</p>
Thames Water	<p>Thames Water have raised no objections and have requested conditions to be included to require a piling method statement. With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water, there would be no objection.</p> <p>They advise that where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.</p> <p>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.</p>

	<p>Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. They advise that they 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 .</p> <p>Groundwater discharges section. There are public sewers crossing or close to your development. They advise that if you are planning significant work near our sewers, to minimize the risk of damage. The applicant is advised to read our guide working near or diverting our pipes.</p> <p>Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, there is no objection. They would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer.</p> <p>Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water request an informative regarding Groundwater Risk Management Permit.</p> <p>Groundwater discharges section. Water Comments 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 a condition that no construction shall take place within 5m of the water main and information regarding diversion be provided.</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, they would not have any objection to the and recommends an informative regarding minimum water.</p>
Environment Agency	No comments to date.
Health and Safety	From the information provided for this planning application, comment that it does not appear to fall under the remit of planning

Executive	gateway one because the purpose of a relevant building has not been met.
Natural England	No comments to date.
Lead Local Flood Authority	Conditions are recommended requiring further details of SuDs system and flood prevention measures.
London City Airport	No safeguarding objections to the proposed development.
Heathrow Airport	No objection as the proposals do not conflict with current safeguarding criteria. If a crane is required, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096 and where a crane is 100m or higher, crane operators are advised to notify the CAA and Defence Geographic Centre.
National Air Traffic Services (NATS)	No objection as the proposals do not conflict with current safeguarding criteria.
Crossrail	No comments given on the application since the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.
London Borough of Tower Hamlets	No observations to make on application.
City of Westminster	Does not wish to comment on the proposal
London Borough of Hackney	No comments received to date.
London Borough of Southwark	No comments received to date.
London Borough of Camden	No objection.
Royal Borough of Greenwich	No objection.

Letters of Representation

In accordance with the SCI, notification letters were sent to residential properties in the vicinity in addition to the site and press notices as set out above. Responses received can be summarised as follows:

Objections

<p>Letters of representation – A petition objecting to the proposed development has been received signed by the occupiers of 44 properties within the Guinness Estate. In addition, 6 individual letters of objection have been received from the owners/occupiers of surrounding sites (4 from Guinness Court residents and 2 from other sites) and 1 letter has been received from the Common Councillor (Jason Pritchard) for Portsoken ward.</p>	
<p>Occupiers of Guinness Estate</p>	<p>Occupiers of 44 flats within Guinness Court have submitted a letter of objection and object on the following grounds:</p> <ul style="list-style-type: none">• Have been living next door to a building development for the last 6 years which has resulted in continuous disruption, noise and dust. The double glazing given as part of the mitigation for this development has proved ineffective at shielding from noise and unworkable in the summer months when the apartments overheat without airflow.• Oppose demolition of Writers House and St Clare house as it will cause enormous noise and dust disturbance.• Question how demolition and rebuild will meet carbon neutral aims of the City of London and urge to consider refurbishment and refit as alternative.• Problem of noise echoing around hard surfaces in the area and resulting in greater noise disturbance than would be expected from a measurement taken at ground floor level at the periphery of the site. It is suggested that this could be avoided if proper noise and dust barrier erected between the estate and the building site i.e a high scaffolding structure.• Part of mitigation for new development should tackle problem of overheating when windows kept close to prevent noise and provide funding for technical cooling.• Requests for respite areas for residents to avoid heat, noise and dust, for example in nearby hotels or other accommodation.• Oppose weekend working. At the weekend ambient noise is very low and so disturbance from building site very noticeable. Urge you to consider 5 day working week in this site so close to social housing. <p>Response to Comment: Consideration of these impacts are contained in the following sections later in the report: Noise and Vibration, Health Impact Assessment, Sustainability and Air quality.</p>

<p>Jason Pritchard - Common Councillor for Portsoken Ward</p>	<p>A letter of objection has been received from the Common Councillor for the Portsoken ward who objects on behalf of his constituents on the following grounds:</p> <ul style="list-style-type: none"> • Concerns about proposed demolition of existing buildings particularly in light of City of London’s carbon neutral aims. Question whether demolition and rebuild is the most sustainable option and suggest refurbishment and refit may be more environmentally friendly. • Residents of nearby social housing estate have already endured six years of disruption due to ongoing building works. They report continuous noise and dust pollution, which has had a detrimental impact on their living conditions. Despite the provision of new double glazing, the noise pollution remains a significant issue, particularly during the hot summer months when windows need to be open for ventilation. • The residents have suggested that a high, sound-deadening barrier could be erected between the building site and the estate to mitigate the noise and dust pollution. This would be a practical solution to address the echoing of noise around the hard surfaces in the area, which amplifies the disturbance. • Furthermore, the residents have raised concerns about the overheating of their apartments when windows are closed to shield them from noise. They propose that part of the mitigation for this new development should include funding for technical solutions to cool their dwellings. • Finally, the residents strongly oppose weekend working. They argue that the ambient noise is very low at the weekend, making any disturbance from building works particularly noticeable. They request that working hours be limited to weekdays only. • The residents have also suggested the provision of respite areas that they can use to escape the heat, noise, and dust. This could be in nearby hotels or other suitable accommodation. • Urge objections to be taken into account when considering this planning application. It is crucial that we balance the need for development with the wellbeing of our residents, particularly those living in social housing who may be disproportionately affected by such projects. • Petition is being submitted which demonstrates the strength of feeling on this issue. If wish to reset
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	<p>our relationship with residents, then the City of London must listen to the voices of residents when they speak on matters such as these.</p> <p>Response to Comment: Consideration of these impacts are contained in the following sections later in the report: Noise and Vibration, Health Impact Assessment, Sustainability and Air quality.</p>
<p>Occupier of Marlyn Lodge, Portsoken Street</p>	<p>A letter of objection has been received from an occupier of Marlyn Lodge who objects on the following grounds:</p> <ul style="list-style-type: none"> • Objects to the proposed changes of use of the 13 Haydon Street (Writers House) and the proposed retail unit along Haydon Street (currently a car park) to Classes E/Town Centre and/or Sui Generis. • If Class E permitted, should be restricted to office use and educational/community space use only and explicitly exclude Class E bars, cafes and restaurants, in order to preserve the residential amenity of the adjacent Guinness Estate and Marlyn Lodge residential buildings. • Sui Generis use should not be allowed at all, as the Sui Generis use is too wide in its definition and would allow the developer to opt for a series of possible uses which could seriously adversely affect the living standard and residential amenity of our adjacent residencies. • In the case of Haydon Street, a dead end street with a potential to quickly be transformed by customers of possible restaurants/cafes/ bars into a beer garden cul de sac, the only change of use allowed should be a Class E office use, to ensure that Marlyn Lodge and the Guinness estate do not face with the Haydon Street development a similar unpleasant experience as currently facing with the noisy Duke of Somerset Pub (15 Little Somerset Street, E1 8AH) and The Minories Pub (64-73 EC3N 1LA), the outdoor loudspeakers and noisy customers of which frequently pour out from their establishments to the surrounding streets. • Any sui generis/Town Centre uses should be limited to the proposed development's retail unit parts directly facing The Minories, where other bars and restaurants are currently operating, to avoid any antisocial behaviour and litter spilling out towards Haydon street and our buildings. • Developer should be requested by the planning office to produce a coherent plan for the protection of all residential buildings in the close vicinity of 30-

	<p>33 Minories and Haydon street, with measures outlined of how our properties and health will be protected from any noise, hazardous dust, diamond drilling and demolition dirt and all the other untoward side effects, which shall inevitably follow with such a huge construction project. This is essential to local residents, particularly due to the nature and size of the proposed project. The suggested development will include a significant demolition of existing buildings and years of construction, and there also is the very real possibility that this construction will for many years overlap with the proposed restructuring of the IBEX building (42-47 Minories, EC3N 1DY) directly next to it. Residents therefore have an expectation that planning officers should exert their utmost due diligence to ensure all building regulations and timeframes of construction are observed by the developers, and that everything which can be done is done in order to ensure that the residential amenities of all homes bordering Haydon Street are preserved both during the lengthy construction period and after.</p> <p>Response to Comment: Consideration of these impacts are contained in the following sections later in the report: Principle of development, Proposed Uses, Noise and Vibration, Health Impact Assessment, Impact on Residential Amenity and Air quality.</p>
<p>Occupier of Fenchurch House, 136-138 Minories London</p>	<p>A letter of objection has been received from an occupier of Fenchurch House who objects on the following grounds:</p> <ul style="list-style-type: none"> • Significant reduction in daylight. The Applicant's submitted daylight, sunlight and overshadowing report indicates VSC reduction above 20% guideline for all floors of Fenchurch House with the reduction to the third floor and above of 33%. • Increased traffic and noise from deliveries. The Applicant's submitted delivery and servicing plan highlights an estimated 30 daily deliveries over a 10 hour period, indicating 3 deliveries per hour. This increased traffic and noise particularly during the 6.00-23.00 proposed delivery window will adversely impact noise quality and air quality for residents. • Proposed high and scale of the building is excessive and given that the neighbouring office spaces have spare capacity, this office space is not required and so the height and scale could be

	<p>reduced.</p> <p>Response to Comment: Consideration of these impacts are contained in the following sections later in the report: Noise and Vibration, Health Impact Assessment, Highways, Air quality and Daylight, Sunlight and Overshadowing.</p>
Occupiers of Guinness Court, Mansell Street	<p>Four further letters of objection received from occupiers of flats within Guinness Court. These object on the following grounds:</p> <ul style="list-style-type: none"> • Residents have already had so much building work going on. • Disruption, noise, dust and impact on health. • Object to weekend working. • Development would result in further loss of daylight • Demolition contrary to carbon neutral aims <p>Response to Comment: Consideration of these impacts are contained in the following sections later in the report: Noise and Vibration, Health Impact Assessment, Sustainability, Air quality and Daylight, Sunlight and Overshadowing.</p>

Support

38. No letters of support have been received.
39. It is noted that all material planning consideration raised in the representations above are addressed within this report.

Policy Context

40. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
41. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. Onward progress of the Plan has been temporarily paused to enable further refinement, but it remains a material consideration in the determination of applications (although not part of the Development Plan). The Draft City

Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

42. 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.
43. 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”.

The NPPF

44. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
45. 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.
46. 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.
47. 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).
48. Chapter 6 of the NPPF seeks to build a strong and competitive economy. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
 49. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
 50. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
 51. Paragraph 97 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
 52. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 109 states that “*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health*”.
 53. Paragraph 116 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.
 54. Paragraph 117 states that “*All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed*”.
 55. Chapter 11 of the NPPF seeks to achieve effective use of the land. Paragraph 123 advises that “*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.*”

56. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*
57. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.
58. Paragraph 136 of the NPPF states that *“Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...”*.
59. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
60. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.

61. Paragraph 159 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
62. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 180 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by, *inter alia*, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It is also stated that development should, wherever possible, help to improve local environmental conditions such as air and water quality.
63. 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.
64. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 201 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
65. 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*
 - c) *the desirability of new development making a positive contribution to local character and distinctiveness.*"

66. 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.*”
67. 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.*”
68. 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*”.
69. Paragraph 209 of the NPPF states “*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*”.

Statutory Duties

70. The Corporation, in determining the planning application has the following main statutory duties to perform:
- To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
 - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
71. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the

desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

72. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).

Main Considerations

73. In determining the planning application before you, consideration has to be taken of the documents accompanying the application, the updated information, the consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
74. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the plan as a whole the proposal does or does not accord with it.
75. The principal issues in considering this application are:
- a) The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.
 - b) The principle of development, including the proposed mainly office led use and associated flexible town centre uses and culture/community uses.
 - c) The economic impact of the proposal.
 - d) The impact of the development on the character and appearance of the area and the design of the building itself.
 - e) The impact of the proposal on the Tower of London World Heritage Site.
 - f) The impact of the development on designated and non-designated heritage assets.
 - g) The impact on strategic views in the London Views Management Framework and on other strategic local views.
 - h) The impact of the development on public realm.
 - i) The impact of the development on ecology.
 - j) The accessibility and inclusivity of the development
 - k) The impact of the development on any potential archaeological assets beneath the site.
 - l) The impact on the development on highway and transportation terms.
 - m) The impact of the development in terms of energy, sustainability and climate change.

- n) The impact of the development on air quality.
- o) The impact of the proposed development on the amenity of nearby residential and other occupiers.
- p) The impact of the development on health and wellbeing.
- q) The impact of the development on fire safety.
- r) The impact on the development on flood risk.
- s) The requirement for the development to secure financial contributions and planning obligations.
- t) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010)
- u) The Human Rights Act 1998

Principle of Development – Economic impact of the proposal

- 76. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
- 77. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.
- 78. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.
- 79. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting

this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.

80. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
81. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041.
82. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
83. London Plan Policy GG2 sets out the Mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well-connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.
84. London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy. To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst

others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.

85. The London Plan projects future employment growth across London. According to the GLA employment projections from October 2022, employment in City projecting an increase of 176,000 between 2016 and 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
86. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
87. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
88. The site is also located within the Aldgate Key City place, policy CS8 supports the regeneration of the amenities and environment of the Aldgate area for business, residents, workers, visitors and students, promoting development and investment by, inter alia, supporting the area an attractive office and residential location, improving transport connection, pedestrian links and enhancing the public realm.
89. The Strategic Vision of the emerging City Plan (2036) sets out that the City Corporation will facilitate a vibrant, thriving and inclusive City, supporting a diverse and sustainable London within a globally successful UK through a range of objectives including: delivering sustainable growth following the Covid-19 pandemic, including a minimum of 2 million sqm net additional office floorspace, and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal

by ensuring new office developments deliver healthy working environments and meet the needs of different types of businesses, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; supporting the development of cultural facilities and uses and transforming the north west of the City into a vibrant strategic cultural area of national and international status through the Culture Mile initiative; focusing new tall buildings in the existing cluster in the east of the City, adding to the City's distinctive and iconic skyline while preserving strategic and local views of St Paul's Cathedral and the Tower of London World Heritage Site; encouraging retail and other town centre uses that provide active frontages throughout the City, while focusing significant retail development in the four Principal Shopping Centres; and balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces;

90. The draft City Plan (2036) policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.
91. The application site is located within the Aldgate, Tower and Portsoken area of change, where a mixed-use area is promoted, which balances the needs of residents, workers and visitors. Policy S20 states that this will be achieved by promoting office-led commercial development to assist further renewal of the area. Diplomatic use and associated commercial activity will be encouraged. Cultural events, arts and play in public spaces are encouraged, as well as improvements in the transport connections, pedestrian connectivity and enhances public realm.
92. One of the Strategic Objectives i within the emerging City Plan (2036) requires to support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture.
93. Paragraph 3.2.2 of the emerging City Plan (2036) sets out the requirements that the quantity and quality of new development, particularly office-led development, will meet growing business needs, supporting and strengthening opportunities for the continued collaboration and clustering of businesses that is vital to the City's operation.
94. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be

an attractive and sustainable meeting place where people and businesses come together for creative innovation. The recently prepared 'Future of Office Use' evidence base report for the City Plan 2040, highlights that the demand for best in class office space is higher than pre-pandemic. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are reflected in the Corporations 'Destination City' vision for the square mile.

95. The proposed development would provide a primarily office lead development, providing a significant uplift in the number of full time jobs; namely from 1,007 to 1906 full time jobs, as well as a material uplift in the office floorspace; namely from 11,350 sqm to 23,603sqm. Therefore, the proposed development would support the strategic objectives of the development plan and the emerging City Plan. The economic benefits of the proposed development would be material and would weigh in favour of the proposed development.

Proposed Uses

96. The proposed building has been designed to provide a flexible office-led development. The 12 storeys above ground would predominantly provide office use (Class E) with flexible town centre uses (Classes E and Sui Generis) at ground and basement level. Within Writers House, 13 Haydon Street the proposal would provide office use (Class E) to the upper floors and cultural/community uses (Classes F1, F2 and Sui Generis) at ground and basement level.

Provision of Office Accommodation

Policy SD5 of the London Plan advises that offices and other CAZ strategic functions are to be given greater weight relative to new residential development within the City.

97. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.2 supports large office schemes in appropriate location. Policy DM 1.3 of the Local Plan seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to

allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2036 and policy E1 of the London Plan.

98. The proposed development would provide predominantly an office-led development, comprising of 23,603sqm GIA of office space Class E(g)(I), an uplift of 12,253sqm GIA. The redevelopment would provide Grade A office space. It is predicted to result in 1,906 new Full Time Equivalent (FTE) jobs. Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City and policy CS8 promotes the Aldgate area as an attractive office and residential location to assist in regenerating the area. The draft City Plan, Policy S1, seeks to deliver 2 million sqm net of new office floorspace in the period between 2016 and 2036. Draft City Plan policy S20: Aldgate, Tower and Portsoken, also seeks to deliver office-led commercial development to assist in the future renewal of the area. The proposed development would deliver an increase of 12,253sqm GIA in Grade A office floorspace on the Cluster, contributing to the achievement of the office floorspace target in both the adopted and emerging draft Local Plans.
99. On the 31st March 2023, 1,442,780 sq.m net increase in office floorspace had either been delivered, was under construction or was permitted in the City. A further 557,220 sq.m net is required to meet the draft City Plan target of 2 million sq.m net by 2036. The floorspace uplift from the proposed development would deliver nearly 2.2% of this remaining floorspace target.
100. The proposed development is 12 storeys. The office use is provided between the first and twelfth floors of the redeveloped building at 30-33 Minories and between the first and fourth floors of Writers house. Other flexible town centre uses are proposed between the lower ground and the ground floor mezzanine at 30-33 Minories. The lower ground and ground floors of Writers house would fall within cultural/community uses (Classes F1, F2 and Sui Generis). Emerging City Plan Policy OF1 promotes commercial uses as part of office-led development at ground levels to activate streetscapes.
101. The typical office floorplate would be approximately 1,120sq.m. The office spaces are designed to support a range of tenants across a range of corporate sector companies, with flexibility to enable to extend across floors, to use part of individual floors through the creation of dividable and flexible space. Emerging City Plan Policy S4 encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.

102. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space. The S106 agreement would include an obligation to make specific and identified provision within the development for such occupiers.
103. The proposal would also provide 710sqm GIA of affordable workspace within Writers House. The applicant's plan is to create 34 self-contained studio spaces and 10 to 15 desks. The majority (approximately 80%) of these will be allocated to individuals or small and medium sized enterprises (SMEs). Policy S4 of the emerging City Plan encourages the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City. Policy E1 of the London Plan also highlights the need for providing affordable workspace to new offices. This provision will be secured through the S106 agreement.
104. For the reason stated above, it is considered that the scheme meets the aims of policies in the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015, S4 of the emerging City Plan 2036 and E1 of the London Plan in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and employment in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in an additional 23,603sqm GIA of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

Proposed flexible town centre uses

105. Policy DM 1.5 encourages mix commercial uses within office development which contribute to the City's economy and character and provide support services for its businesses, workers and residents. Similar support of other commercial uses particularly at ground and basement levels is also supported by policy OF1 of the emerging City Plan.
106. The proposed development is supported by a maximum of 1,997sqm minimum of 1,099sqm GIA of town centre uses (use classes E(a-d) (g(i)) and Sui Generis) including a mixture of retail, food and beverage and sports uses at basement, ground and mezzanine levels.
107. Although the site does not fall within a primary shopping area, it is already occupied by a restaurant, café and drinking establishment at ground and lower ground floors. The maximum additional floorspace to be created would equate to 785sqm GIA.

108. Active retail frontage would be retained across the ground floor along Minories and Haydon Street. Therefore, the proposal would support the main function of the City and the aims of the development plan and accord with the relevant planning policies, as stated above.

Proposed Office and Community/Cultural uses at Writers House

109. Local Plan policies CS22 and DM 22.1 support the provision of community services. It is advised that development of “*new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:*”
- *where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;*
 - *in locations which are convenient to the communities they serve;*
 - *in or near identified residential areas, providing their amenity is safeguarded;*
 - *as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.”*
110. Similar requirements are set in Draft City Plan 2036 policies S1 and HL5.
111. Policy CS11 of the London Plan seeks to maintain and enhance the City’s contribution to London’s world-class cultural status and to enable the City’s communities to access a range of arts, heritage and cultural experiences, policy S6 of the Draft City Plan also advises that the contribution to culture offer will be experienced by, *inter alia*, Providing, supporting, encouraging access to and further developing a wide range of creative and cultural spaces and facilities across the City. Furthermore, it is stated that all major developments should be supported by a Cultural Plan outlining how the development will contribute to the enrichment and enhancement of the City’s cultural offer.
112. Part of the proposed development, following engagement with the local stakeholders, including a diverse in terms of ethnicity, level of advantages and age communities, would involve the provision of a cultural/ community facility at lower ground and ground floors of Writers House, with affordable workspace to the upper floors.
113. The site is located in close proximity to residential units, including the Mansell Street residential Guinness Estate immediately adjacent to the east, several residential units along Minories and student accommodation on Vine Street. Furthermore, due to the site’s proximity to the Tower of London, Tower Bridge and significant numbers of hotels means that the site has the potential to serve visitors to London as well as local people.

114. The proposal is to utilise the ground floor for a combination of quite working/studying space and areas for social interaction and activities for all age groups, whilst the lower ground floor would be used as a knowledge sharing and skills development area. It is also proposed that the lower ground floor would feature a permanent display of archaeological artifacts found on site.

- The proposed vision for the use of Writers House is the creation of a community hub. To ensure effective governance, it is suggested that a Trust will be created with local representation. As explained above, the ground and lower ground floors will be multipurposed and open through the week, including weekends and evenings, providing flexible space, programmed with a diverse range of community activities, including training courses for skills development. Affordable workspace will be provided between the first and fourth floors, with an aim for strong synergy with the ground floor uses. A programme providing free space for local entrepreneurs and start-ups to test new ventures and ideas will also be provided.
- The proposed community/culture space would also extend to a new public space to the north of Writers House, which will be called Sheppy Place. The space would provide public realm for the both the office development at 30-33 Minories and the visitors to Writers House. The space will be landscaped and would provide seating for the public and users, including the provision of planting of flowers and vegetables from locals. It is proposed that public art installation will be commissioned by local artists and created through community projects. This would be able to be secured through an obligation in the S106 agreement and the details of the landscaping of the scape through the imposition of an appropriately worded condition.
- In light of the above, it is considered that the proposed development in Writers House would provide a new social, flexible, multi-use space suitable for a range of different uses. Importantly, it would be a focal point for the display and interpretation of the rich archaeological legacy of the development site, through (i) the potential exposure and display of the archaeological remains surviving in the west wall and (ii) the display of a curated exhibition and artefacts recovered from the development site to tell the story of the site and its wider context. There would also be local public art installation in the public realm and the provision of display of artwork from local artists at the entrance of the building.
- Overall, the proposed development would be located in a convenient location to local communities, near a large number of residential properties. Furthermore, by the provision of affordable workspace to the upper floors would fulfil the City's vision to providing inclusive

workspace. The details of the community/culture plan will be secured through a S106 agreement. The proposal is therefore, considered to be in compliance with the relevant policies of the Development Plan.

Design and Heritage

Design Approach: Architecture, Urban Design and Public Realm

Architecture

115. The proposals seek to make the optimal use of land within a highly sensitive setting within the backdrop of the Tower of London World Heritage Site and the grade II Ibex House. 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 growth and would assist in the regeneration of the Aldgate area as an attractive office and residential location. The proposals would create a high-quality office-led commercial development with a new community use within Writers House which would support the needs of the residents at Mansell Street Estate. The proposal would supply a range of office space, from large open flexible space located with the new building and smaller spaces within Writer House. In this, the proposals would accord with Local Plan Policies CS8 Aldgate, Draft City Plan Policy S19 Aldgate Tower and Portsoken and London Plan Policies SD 4, SD5, SD6 and E1. It is considered that the scheme would represent 'Good Growth' by design, in accordance with the London Plan Good Growth objectives GG1-6: growth which is socially, economically and environmentally inclusive.
116. The disposition of the final massing and bulk has followed a design-led approach considering macro and local townscape impacts. The development has been designed to respond to locations of existing residential amenity, visual experiences including local views, views sensitive to the Tower of London, and in strategic views in the LVMF, such as that from the North Bastion of Tower Bridge and from Queens Walk. The massing and façade design have also been designed around the delivery of optimal microclimatic conditions, including daylight, sunlight and overshadowing to the building and its neighbours; as well as creating opportunities for urban greening and accessible amenity spaces.
117. In respect of massing, height and colouration, the development would appear as a complete city block which is broken down to match the existing urban grain of Minories. The higher elements of the scheme are stacked towards the north and northeast of the site and are commensurate with the heights of consented and implemented developments around the Aldgate bus station.

118. The existing St Clare House ranges in height between 34.97m to Minories which then steps up in height to a maximum of 65.90m AOD of the tower element. The proposed massing of the new building would step from five storeys (37.27m AOD) up seven storeys (44.95m AOD) along Minories, relating to the context of the streetscape. The massing would then step down from Minories along Haydon Street, responding to the scale of Writers House and the change in levels of the site, from seven storeys (49.95m AOD) on the southwest corner to six storeys (37.27m AOD) with a setback floor (41.11m AOD) to the southeast corner. The massing would step up towards the east of the site, to thirteen storeys (69.01m AOD) on the corner of St Clare Street and Sheppy Place. This taller element would provide fully enclosed space for plant.
119. The massing and bulk of Writers House would not change. Level access would be introduced from Haydon Street by removing the existing steps and introducing a platform lift. All windows on the west elevation would be infilled as part of its incorporation into the wider redevelopment. There would be no changes to the internal layout of the upper floors.
120. Architecturally, the proposal would read as a series of distinct but connected buildings, tied together by a consistent, highly articulated architectural design and subtle changes in colour and materiality.
121. The present form of the development has been reached through the pre-application negotiations to develop a gentler transition in scale towards the south, reductions in height, softening of angularity and introduction of setbacks and terracing at the upper levels. Macro visual impacts are further mitigated by the intricate facade detailing and the introduction of different colour tones through the facade ranging from dark to light.
122. To Minories, the proposed development would step up and away from the lower scale of Minories towards the larger building scale found to the north of the site. The setbacks and terracing would allow for extensive urban greening and serve to minimise the building's height in relation to context. The expression of the building as one of interrelated parts would reduce the overall sense of scale and bulk, complemented by the curved corners, inset balconies and changes in colour across the building.
123. Along Haydon Street the new building would step up from Writers House and reinstate a finer urban grain, responding to the adjacent heritage assets, Writers House and Ibex House. The architectural language of the Haydon Street elevation would link the wider development of the site with the existing character of the street, utilising the same detailing as found elsewhere on the development while introducing buff and orange hues to the colouration of the façade.

124. There has been a considered approach to design detail of the main block. The upper levels of the building are broken down into nine blocks which are divided by balconies and terraces which all utilise greening. The blocks are broken down into vertical bays with triangular tiled piers, with the glazing line significantly setback from the frontage to create depth and natural solar shading. The glazing is subdivided horizontally by decorative perforated spandrel panels which would provide ventilation to the building. There are clear datums which respond to surrounding buildings. Each block is terminated with a deep planted parapet, the meter wide planted zone provides significant levels of greening to proposal and creating a visual buffer to the 1.525m terrace balustrade, making it less visible from the street. A similar strategy is used on the southern elevation to conceal the BMU from the strategic views across the Thames (LVMF 25.A), with a two meter high planted screen.
125. The facades would be well articulated and include an expressive richness of detail, creating a high-quality matt glazed brick building. Variation is further introduced through inset balconies as a vertical feature on the Minories and Sheppy Place elevations which assists with mediating the stepping in height and breaks up the overall massing of this large city block.
126. Materiality has been a central consideration. The building would have a high-quality brick appearance, which has been developed with the intention of using low embodied carbon materials.
127. The use of matt glazed brick would express solidity and masonry and would integrate the architecture into the established townscape which is defined by Portland stone, or brick. The quality of the brickwork and the brick patterning is intended to be simple but highly executed in detail. The brick tone is intended to vary to respond to different context with the use of a buff toned brick to the elevation along Haydon Place, red tones to the ground floor along Minories and the use of varying blue tones up the body of the building. The proposed materiality including tonality, design details and intricacies would be secured through conditions including samples and mock ups of typical bays.
128. The development would transform the existing ground floor experience to Minories introducing a defined, active base of a human scale expressed predominantly as a single height with a double height expression over the main office entrance located at the centre of the elevation fronting Minories. Retail uses would be fronting Minories would aid the activation at ground floor. The frontage along Haydon Street would be activated by introducing flexible office/town centre uses to the corner unit and community uses to the lower ground and ground floor of Writers House. The user experience of Writers House would be improved with the introduction of level access from the street and increasing the size of the

ground floor windows which would create a better visual connection from the street.

129. The breaking down of the massing and stepping back at higher levels would provide opportunities for significant green roofs and roof terraces creating significant urban greening. Additional opportunities for urban greening are delivered through inset balconies within the full length of the façade. These elements are compliant with Local Plan policies, CS10, policy DM10.2 and DM10.3.
130. The significant urban greening to the balconies and terraces would be visual and physical amenity for the occupants of the office floors supporting their mental health and wellbeing.
131. The terraces have been designed in line with the City of London Corporation Preventing Suicides in High Rise Buildings and Structures planning advice note. The balustrading of the terraces is 1.525m high and has a planted buffer zone located beyond the balustrading line, creating a natural deterrent. Further detail regarding suicide prevention would be secured via condition.
132. M&E plant and building services would be accommodated in the basement, tenth and eleventh floor, with PV panels and BMU's incorporated at roof level behind planted parapets and plant screens. At roof level the plant room would be orientated to the north and integrated to the overall clean lines of the architecture. Further details are required and would be secured via condition including the 5th elevation. Additional decorative louvres would form part of the inset along Haydon Street and perforated spandrel panels would be incorporated into the façade system.
133. Servicing areas are situated on the access road to the north of the site, St Clare Street. Both these areas would be well designed utilising decorative screening and planted screens matching the overall palette of the building to reduce visual impact, in compliance with DM10.1 (7) Local Plan 2015.
134. Active travel Emerging Strategic Policy S8 (1/2) seeks to optimise pedestrian movement by maximising permeability, promote active travel, and create a safe, welcoming, attractive, convenient, comfortable and inclusive public realm. This is substantiated by emerging London Plan Policies D1, D4, D8 and G4, emerging City Plan 2036 Policies, D3, D4, S14 and OS1 and adopted Local Plan Policies CS16, DM16.2, CS19 and DM19.1, which seek to increase the quantity, quality and accessibility of public open space.
135. The proposed ground floor layout, active and open façade, and prominent and distinctive entrances would make a positive contribution to the surrounding streets. Entrances to different uses would be prominently

positioned along Minorities including the various retail units and office. The entrance to Writers House would be refurbished to incorporate level access from the street and improve the visual connection into the building. This would be highly legible, and the cultural use would have a particularly positive relationship to the improved public realm, attractive outside hub for visitors positioned close to the Mansell Street Guinness Estate.

136. Cycle parking facilities would be accessed via a prominent entrance on Haydon Street. The short-stay cycle parking would be provided in locations on the corner of St Clare Street and Sheppy Place and within the public realm at Sheppy Place integrated into the landscaping. The active edges and improved pedestrian experience and cycle facilities would encourage active travel walking and cycling. The proposals support active travel and comply with Local Plan policy DM10.1 and Emerging policies S8 (1) (2) (6) and DE2.
137. Irrespective of the submitted drawings, full details of the ground floor frontages, design and materiality of the public realm improvements, 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.
138. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City by night. A detailed Lighting Strategy would be subject to condition to ensure final detail, including from, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy. The proposed public realm lighting strategy would provide low level illumination to architectural and landscape features, to enhance the pedestrian experience and improve safety.
139. A high-quality signage strategy for the proposal would be required and would be secured via condition.

Urban Design and Public Realm

140. The layout of the ground plane, with its arrangement of routes, refreshed public spaces and uses will generate activity at ground floor level, positively stitching the site into the wider urban grain. The enhanced routes and public spaces would contribute to an urban structure characteristic of the city, with streets, courts, routes and public spaces which are welcoming, convenient to use and attractive. The proposals represent

compliance with London Plan Policy D3 and Local Plan Policies CS10, DM10.1 and DM10.4, by offering buildings and spaces that positively respond to character, distinctiveness, scale and appearance of the City's public realm.

141. In the refreshed public space, Sheppey Place, seating, greening, landscaping, new surface materials and spill out space for ground floor occupiers will enliven and animate the public realm, which is currently underutilised. The re-invigorated courtyard has been designed to be a dwell space with a positive synergy to its adjacent proposed uses, whilst providing opportunities to dwell and spend time, with an enhanced level of greening. The design and appearance of the proposals would encourage use of the space and the disposition of uses around the Sheppey Place would 'design in' passive natural surveillance providing some safety in what is currently a secluded and private area. Generally, the proposed buildings would create spaces that are comfortable in terms of wind, thermal comfort and daylight, overall, these aspects of the proposals are considered to be compliant with London Plan Policy D3 and D8 and Local Plan Policies CS10, DM10.1 and DM10.4, by creating public spaces that have a positive relationship with their context and the proposed building.
142. The lower floors would be transformed to be outward facing and visually permeable, encouraging positive relations between the ground floor uses and the adjacent public realm, the base would be an integral part of the arrival experience, which prioritises active travellers by design. The façade treatments at ground floor level are well-suited to pedestrian desire lines and sightlines, particular care and attention has been paid to meet the needs of pedestrians and cyclists, the most sustainable transport modes. The provision of safe and attractive cycle facilities would be accessible and visible to cyclists promoting active travel, representing compliance with London Plan Policy D3 by prioritising the most sustainable transport modes.
143. The proposed building would generate a significant amount of pedestrian footfall along the footways adjacent to the site, which have existing narrow pavements with vehicle cross overs, the northern boundary has no continuous pavement. The proposals would be subject to a s278 agreement, which would seek to mitigate the impact of the development by reconstructing footways as necessary and delivering improved infrastructure for active travellers. This improved pedestrian infrastructure, prioritising the needs of pedestrians and cyclists, is a positive aspect of the proposals. It is considered that the proposals would make a positive contribution to the accessibility and inclusivity of the area in a local context, in accordance with London Plan Policies D3, D8 and T2.

144. Active frontage would be focussed on the site's periphery, with some inward facing activation around the Sheppey Place. The mixed use nature of the proposals would result in a positive contribution to the vibrancy and activity of the area, offering social and economic benefits. The provision of mixed uses, with an active ground floor and dwell space would promote activity at different times of day and on different days of the week, appealing to a range of audiences and attracting a diverse range of users to the site. Altogether, the proposals would provide high quality public realm, alongside more pedestrian-focused streets which promote active travel and are comfortable, convenient and attractive, in accordance with London Plan Policy D3 and City Plan Policy S8 and Local Plan Policies CS10, DM10.1 and DM10.4.
145. An appropriate management of the public realm, both internal and external, would be ensured via the section 106 agreement. A Public Realm Management Plan, will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8 and guidance in the Public London Charter.
146. The proposed servicing would be undertaken on St Clare Street, which currently has a pavement on the north side of the street only, to minimise any potential conflict between vehicles and pedestrians. On Sheppey Place the road surface and pavements would need to be re-designed and reconstructed to accommodate service vehicle traffic, which would be delivered through the aforementioned s278 agreement. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, with minimal disturbance or inconvenience of the surrounding public realm. The proposed servicing is considered to take place in the optimal location for the site, altogether, the proposals are in accordance with London Plan Policies D3, D8 and T2.
147. The proposal would deliver green infrastructure, optimising the quantum and planting palette in a manner which is human-centred, seeking to improve health and wellbeing, landscaping in the centre of the Sheppey Place would transform what is currently a hardscaped environment. Final details, including planting palettes, specifications and fit out, are reserved by condition with the intent to optimise the inherent biodiversity and wellbeing benefits, in accordance with London Plan Policy D3 and D8 and and Local Plan Policies CS10, DM10.1 and DM10.4.
148. The proposed materials would be robust and high quality, with the final detail of surface materials and specification of street furniture reserved for condition. The use of Yorkstone paving in the public realm would read as a continuation of the surface treatment on adjacent streets and spaces,

helping to suggest to pedestrians that the space is publicly accessible. The routes and alleys through the building would have elevations and soffits finished in high quality and attractive materials, which are reflective of the city's characterful routes and alleys. The new public realm would be a seamless extension of the City's continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Technical Guide, with final detail reserved for condition. The overall materiality of the public realm and lower floors of the building would have a coordinated design aesthetic and overall the proposals are considered to be acceptable.

149. An appropriate management, curation and programming of the public realm, both internal and external, would be ensured via section 106. A Public Realm Management Plan and Cultural Implementation Strategy, will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8(H) and guidance in the (draft) Public London Charter.

Conclusion on Architecture and Urban Design

150. The proposals would successfully mediate the changes in scale in its local townscape and would significantly enhance the wider street block within which it sits. The stepped massing, distinctive sense of separate blocks, highly articulated design, materials, varied tones of colour and intended quality would introduce a well-considered, refined, neighbourly architectural set piece. The development would be sensitive to townscape contexts at macro and local scale and would optimise the use of land, whilst significantly improving the buildings' interface with their surroundings.
151. The development would create a high-quality office-led commercial development alongside creating a new community use within Writers House which would support the needs of the residents at Mansell Street Guinness Estate in accordance with Local Plan strategic Policies CS 8: Aldgate and Key Areas of Change Policies in the emerging City Plan Strategic Policy S19: Aldgate and Tower.
152. It is considered the proposal would constitute Good Growth by design in accordance with Local Plan Policies CS 10 and DM 10.1, emerging City Plan Policy S8 and DE2 and London Plan D3, the policies contained in the NPPF and guidance in the National Design Guide, contextualized by the London Plan Good Growth objectives, GG1-6. The proposals would also align with the objectives of Destination City by improving the public realm and creating a new sense of place in this part of the City of London.

153. Overall, the proposal would optimise the use of land to deliver a transformative new mixed-use destination for the area. It would result in a diverse mix of use, with curated and programmed publicly accessible spaces, both internal and external, transforming an underutilised site with little active ground floor uses and limited accessible public realm into a new commercial and cultural hub for the City and London. It would deliver an enhanced public realm, enhancing convenience, comfort and attractiveness in a manner which optimises active travel and the City's public realm objectives.
154. The improvements to the public realm represent good place making and there would be gains qualitatively compliant with the NPPF design policies, London Plan policies, Local Plan policies, Draft City Plan policies, the City Public Realm SPD.
155. The development would provide high quality office space with cultural use at ground and lower ground at Writers House and improved public realm. It would contribute to the enhancement of this south-eastern part of the City and help to support existing, important, metropolitan tourist destinations including Tower of London and Tower Bridge. In these senses, the proposals would accord with the City's broader visions to deliver outstanding places, as part of 'Destination City', 'City Recharged' (2020), 'Future City' (2021) and 'Culture and Commerce' (2021).
156. The proposals are in overall general conformity with Local Plan strategic Policies CS10 (Design), London Plan Policies D3/D8 and emerging City Plan 2036 Strategic Policy S8 (Design).
157. An informative for architect retention is proposed.

Built Heritage

Strategic Views and Indirect Impacts on Designated Heritage Assets:

London View Management Framework (LVMF)

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

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

160. The seven overarching attributes of Outstanding Universal Value which are contained in the Statement of Outstanding Universal Value and the World Heritage Site (WHS) Management Plan, have underpinned this assessment, alongside the components contributing to each attribute. It is considered that three attributes are of particular relevance to assessing the impact of the proposal on setting are: i.) an internationally famous monument ii.) landmark siting and iii.) physical dominance of the White Tower.
161. The WHS Management Plan establishes a 'local setting area,' an 'immediate setting' and a non-spatially defined 'wider setting.' The proposal site is in the wider setting. The Local Setting Study (section 7) identifies the main views and/or viewpoints to and from the Tower of London (ToL) which are deemed to best exemplify the OUV, with management guidance providing a baseline for assessing change. The representative views/viewpoints include a number of LVMF viewing locations. Whilst being proportionate, this assessment adopts the assessment framework in the Mayor's 'London's World Heritage Sites: Guidance on setting' SPG, which is based on the relevant ICOMOS guidance, including the impact tables at Appendix 3 and 4, in conclusion.
162. The proposal would have an indirect impact, via change in the wider setting of the WHS. Change is not necessarily harmful. That change would be apparent in a number of views including those from Tower Bridge, Queen's Walk, around City Hall and Potters Fields and glimpsed from the Inner Ward of the ToL and from the south side of Tower Green.

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

163. The proposal would be visible in the Townscape Views from Queens Walk between Assessment Points 25A.1-3. This view is identified in the Tower of London WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of this view is the Tower, the identified Strategically Important Landmark, and it is deemed to best represent its OUV. The view includes other identified landmarks the Monument, visible upstream and Tower Bridge, visible downstream. The silhouette of the Port of London Authority is distinctive and marks an important transition between the City and the Liberties, the defensive open space around the Tower. The juxtaposition of the modern cluster of towers including Tower 42, the Heron Tower and 30 St Mary Axe (aka the Gherkin), which are other

landmarks identified in the LVMF, reflect the 900 years of history and this is considered a central characteristic of this view.

164. The LVMF states that such understanding and appreciation is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued.
165. The visual management guidance also states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (paragraph 186). The visual management guidance anticipates the consolidation of the Cluster which it is deemed will add to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (paragraph 187).
166. The site is located 400m north of the Tower of London World Heritage Site and would not impact on the Protected Vista from 25A.1. The existing St Clare House has a fleeting impact on the dynamic Protected Silhouette between Assessment Points 25A.1-3 and the proposals would maintain this impact. This is assessed in more detail in the paragraphs below.

LVMF Townscape View 25A.2 Queens Walk (BHTVIA VIEW 1)

167. The Tower of London is the focal point of the view, the turrets of the White Tower can be appreciated. The City Cluster is just outside of the view on the left. The City's skyline has evolved over centuries and comprises a multitude of features, ranging from the White Tower's medieval battlements to the blue cladding and horizontal louvres of the St Botolph Building, visible to the left of the White Tower.
168. The LVMF notes of this view (25A.2) that "Tower Bridge complements the World Heritage Site, though today their relationship is undermined by the architecture that exists between them in the background. From this Assessment Point the view includes the towers of Canary Wharf, seen through the bridge" (para 413). A Protected Silhouette is applied to this view (25A.2) and relates to the outline of the turrets of the White Tower and the surrounding parts of the Norman fortress.
169. The uppermost section of the existing St Clare House can be seen on the left-hand side of the existing view with its pale grey cladding and visible antenna to the flat roof. The building sits quietly within the background amongst other development within the skyline. Immediately adjacent to it in the view is the silhouette of The Haydon, a residential tower which neighbours the site to the north-east.

170. In the baseline and cumulative scenarios, the proposed development would occupy very slightly more sky space than the combined existing silhouettes of St Clare House and The Haydon. The uppermost parts of the proposed south elevation would be a calm, well-designed and orderly element in the view, sitting comfortably in the background. The solidity and high-quality materials of the elevations would give the proposal a discreet presence in the view by day and by night. The proposal would not diverge appreciably from the proportions, materials and detailing of the other modern buildings in the backdrop of the view, and it would introduce a more uniform roof termination and the removal of roof antenna to provide a 'clutter' free roofscape.
171. Given the pre-eminence of the river Thames in the foreground, and the significant intervening distance between the ToL and the proposal, it is considered that the proposal would not undermine the composition and characteristics of the view, or those landmark elements. In both the baseline and cumulative scenarios, it would preserve the observer's ability to recognise and appreciate the ToL as the Strategically Important Landmark.
172. Overall given its siting, the proposal would not affect the clear sky backdrop of the White Tower, and would not impose itself on it, having a neutral impact on and thus preserving all those relevant attributes of OUV and identified landmarks – preserving the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower. It would not be harmful to the view, setting or significance of the ToL WHS or its OUV.

LVMF Townscape View 25A.1 Queens Walk (BHTVIA VIEW 2)

173. The Tower of London is the focal point of the view, the turrets of the White Tower can be appreciated. The City Cluster is just outside the frame of the view on the left. The City's skyline has evolved over centuries and comprises a multitude of features, ranging from the White Tower's medieval battlements to the blue cladding and horizontal louvres of the St Botolph Building, visible to the left of the White Tower.
174. For this particular viewing point (25A.1), the LVMF notes that "This view provides the greatest understanding of the World Heritage Site ensemble where there are clear views of the southern and western faces of the White Tower down to the roof of the Waterloo Block. The clear view of the sky in the backdrop of the White Tower is an important attribute" (para 412)
175. In the existing view, the uppermost section of the existing St Clare House is visible between the White Tower and One America Square Conference

Centre with its pale grey cladding and visible antenna to the roof seen against the skyline. The building sits directly behind the westernmost turret of the Waterloo Block, the silhouette of which is seen against the light grey cladding of the existing building. Immediately adjacent to it in this view is the silhouette of The Haydon.

176. In the baseline scenario, the proposal would occupy approximately the same amount of sky space as the combined existing silhouettes of St Clare House and The Haydon. The uppermost parts of the proposed west and south elevations would be a calm, well-designed and orderly element in the view, sitting comfortably in the background. In the cumulative scenario the 2020 60 Aldgate High Street scheme would appear behind and to the left of the proposal, further merging it with the modern development visible in the background. The solidity and high-quality materials of the elevations would give the proposal a discreet presence in the view by day and by night. The proposal would not diverge appreciably from the proportions, materials and detailing of the other modern buildings in the backdrop of the view, and it would introduce a more uniform roof termination and the removal of roof antenna to provide a 'clutter' free roofscape.
177. The proposal would present an orderly and well-designed background to the silhouette of the turret of the Waterloo Block, which would continue to be a legible and well-defined element of the view.
178. Given the pre-eminence of the river Thames in the foreground, and the significant intervening distance between the Tower of London and the proposal, it is considered that the proposal would not undermine the composition and characteristics of the view, or those landmark elements. In both the baseline and cumulative scenarios, it would preserve the observer's ability to recognise and appreciate the Tower of London as the Strategically Important Landmark.
179. Overall given its siting, the proposal would not affect the clear sky backdrop of the White Tower, and would not impose itself on it, having a neutral impact on and thus preserving all those relevant attributes of OUV and identified landmarks – preserving the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower. It would not be harmful to the view, setting or significance of the ToL WHS or its OUV.

LVMF Townscape View 25A.3 Queens Walk (BHTVIA View 6)

180. The Tower of London is the focal point of the view, the turrets of the White Tower can be appreciated. The City Cluster is just outside the frame of the view on the left. The City's skyline has evolved over centuries and

comprises a multitude of features, ranging from the White Tower's medieval battlements to the blue cladding and horizontal louvres of the St Botolph Building, visible to the left of the White Tower.

181. The LVMF notes of this view (25A.3) that it "is orientated towards the Tower of London and the cluster of tall buildings in the City. The juxtaposition of built elements from a variety of eras is an aspect of the view. The White Tower generally stands free of background development, but other elements of the Tower complex have a backdrop of development" (para 413). A Protected Silhouette is applied to this view (25A.3) and relates to the outline of the turrets of the White Tower and the surrounding parts of the Norman fortress.
182. The western uppermost section of the existing St Clare House is visible above the Waterloo Block behind the western portion of the White Tower. Its pale grey cladding and 'cuboidal' form is seen directly adjoining and breaching the Protected Silhouette of the White Tower. The LVMF SPG states (para 420) that the Protected Silhouette 'should not be altered by development appearing in its background when viewed from any point between Assessment Points 25A.2 and 25A.3'. As such, the existing silhouette of St Clare House, though built long before the designation of this view in the LVMF, conflicts with the guidance in the LVMF SPG, and the proposals for 30-33 Minories would maintain this conflict.
183. In the baseline scenario, (including the zoomed version of View 6), the proposal would occupy a similar silhouette to the existing building although its lower, stepped storeys would project forward and encroach very slightly more into the skyline at the lower level above the Waterloo Block.
184. During pre-application discussions officers sought to find ways to reduce or remove the existing breach of the Protected Silhouette caused by St Clare House, but doing so would have revealed the form of the existing Motel One building directly to the north of the site, which occupies the same silhouette of and is presently concealed by the existing St Clare House.
185. Also relevant is the proposal for 60 Aldgate High Street that was recommended for approval and received Resolution to Grant (RtG) status in 2016. The silhouette of this 2016 scheme encroached further into the same sky space than the proposal at 30-33 Minories, and was not considered to cause harm to the setting of the World Heritage Site. Seen together, the proposed silhouette of 30-33 Minories would sit wholly within that of the 2016 60 Aldgate High Street scheme. As such, the very slight additional encroachment into sky space in this view by the current proposals is not considered to cause harm to the setting of the World Heritage Site.

186. However, it is important to note that this 2016 RtG scheme at 60 Aldgate High Street has since been superseded by a revised RtG scheme of 2022, which reconfigured the massing so that it is concealed behind the existing silhouette of St Clare House. Although it is this 2022 scheme that would form the cumulative scenario against which to assess the current proposals, the 2016 scheme is considered a relevant precedent for them
187. Under both baseline and cumulative scenarios, only a small part of the proposal would be visible in the view. It would appear as a discreet, orderly and well-designed presence only fractionally visible. The solidity and pale blue hues of the proposal's visible elevations would contrast strongly with those of the White Tower, allowing it to remain the pre-eminent focus of the view.
188. Given the pre-eminence of the river Thames in the foreground, and the significant intervening distance between the Tower of London and the proposal, it is considered that it would not undermine the composition and characteristics of the view, or those landmark elements. In both the baseline and cumulative scenarios, it would preserve the observer's ability to recognise and appreciate the Tower of London as the Strategically Important Landmark.
189. Overall, and with the aforementioned precedents in mind, it is considered that the proposal would have a neutral impact on this view. It would not affect the clear sky backdrop of the White Tower beyond the existing and accumulative development, and would not impose itself further on it, having a neutral impact on and thus preserving all those relevant attributes of OUV and identified landmarks – preserving the relationship with the River, the city, and the iconic form, silhouette and 'dominance' of the White Tower. It would not be harmful to the view, setting or significance of the ToL WHS or its OUV.

Additional Views

190. Three additional viewpoints were included in the Built Heritage, Townscape and Visual Assessment to complement the LVMF views: View 3: Queen's Walk – Point A; View 4: Queens Walk – Point B and View 5: Queen's Walk – Point C. Taken together with the formal Assessment Points, this sequence of views conveys the kinetic experience of walking along Queen's Walk.
191. In this kinetic experience, the impact of the proposals would largely be the same as that described above at each of the Assessment Points. The proposal would occupy approximately the same sky silhouette formed by the combined existing silhouettes of St Clare House and The Haydon. But

for some very slight and fleeting further incursions into clear sky space outside of these established silhouettes, the proposal would remain within and not appreciably diverge from them during the kinetic experience.

192. As with the impact on the Assessment Points, the upper levels of the south and west elevations of the proposal would be visible as a discreet, orderly and well-designed presence. The solidity and pale blue hues of the elevations would help to subdue its presence in the views and contrast sharply and effectively with the older, darker stonework of the buildings within the ToL, which would remain the pre-eminent focus in the viewing experience.
193. Given the pre-eminence of the R Thames in the foreground, and the significant intervening distance between the Tower of London and the proposal, it is considered that it would not undermine the composition and characteristics of the kinetic viewing experience, or those landmark elements. In both the baseline and cumulative scenarios, it would preserve the observer's ability to recognise and appreciate the Tower of London as the Strategically Important Landmark.
194. Overall given its siting, the proposal would not affect the clear sky backdrop of the White Tower beyond the existing and accumulative development, and would not impose itself further on it, having a neutral impact on and thus preserving all those relevant attributes of OUV and identified landmarks – preserving the relationship with the River, the city, and the iconic form, silhouette and 'dominance' of the White Tower. It would not be harmful to the view, setting or significance of the ToL WHS or its OUV.

LVMF 10A.1- Tower Bridge – River Prospect, Tower Bridge (Upstream, North Bastion) (BHTVIA View 7)

195. The LVMF SPG states that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued. It also states that the middle ground includes the varied elements of the city, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as the spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background include the Cannon Street Station towers, BT Tower, Centre Point and the Tate Modern (para 182).

196. The guidance also states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground; that guidance applies, in particular, to the Monument (para 185). The visual management guidance also states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186).
197. The proposed development is shown as a render in View 7. In the baseline and cumulative scenarios, only the upper parts of the proposal would be visible, at some distance to the right of the White Tower, as it rises up slightly within the background view of the eastern tower to the Waterloo Block. As with the impact on the Queen's Walk views, and in the sequential kinetic approach across Tower Bridge, the proposed building would occupy approximately the same sky space as the existing silhouette of St Clare House, with no further impact on the Protected Silhouette of the White Tower over and above that of the existing building from both the Assessment Point and in the wider bridge experience. In both cases it would appear as a discreet, orderly and well-designed presence only fractionally visible as an incidental element of modern development in the backdrop some distance away. The solidity and pale blue hues of the proposal's visible elevations would contrast strongly with those of the White Tower, allowing it to remain the pre-eminent focus of the view. The proposal would also introduce a more uniform roof termination and see the removal of roof antenna to provide a more 'clutter' free roofscape.
- 198.
199. Given the pre-eminence of the river Thames in the foreground, and the significant intervening distance between the Tower of London and the proposal, it is considered that it would not undermine the composition and characteristics of the view, or those landmark elements. In both the baseline and cumulative scenarios, it would preserve the observer's ability to recognise and appreciate the Tower of London as the Strategically Important Landmark.
200. Overall given its siting, the proposal would not affect the clear sky backdrop of the White Tower beyond the existing and accumulative development, and would not impose itself further on it, having a neutral impact on and thus preserving all those relevant attributes of OUV and identified landmarks – preserving the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower. It would not be harmful to the view, setting or significance of the ToL WHS or its OUV.

Other World Heritage Site Views

201. The Local Setting Study (Section 7) identifies Representative Views which are deemed to exemplify the OUV of the ToL. It provides an analysis of the character of these views as a baseline against which change can be assessed. In particular, the following were assessed within the BHTVIA: View 8: Tower Bridge Approach; View 9: Tower of London: Inner Curtain Wall – Martin Tower; View 10: Tower of London/Tower Green.

BHTVIA View 8: Tower Bridge Approach

202. View 8 captures the viewer's experience on Approach Route 14: Tower Bridge and Local Setting Route 6: Tower Bridge Approach as set out in the Tower of London Local Setting Study (2010). The viewpoint is located on Tower Bridge Approach opposite Develin Tower. It is oriented northwards towards the Site and approximately 530 m to the south of the Site.
203. The proposal is shown as a blue wireline in View 8. The application site is situated in alignment of Brass Mount within the view but the proposal would be completely screened by the intervening development and the trees on Tower Hill. Only a very small part, almost invisible to the eye, would appear next to the modern development at the southern end of Minories. The screening effect of the trees would remain during the winter months, almost entirely obscuring the buildings behind.
204. Overall given its siting, the proposal would have no impact on the view thus preserving all those relevant attributes of OUV and identified landmarks – preserving the relationship with, the city, and the iconic form, silhouette and 'dominance' of the Tower of London walls. It would not be harmful to the view, setting or significance of the ToL WHS or its OUV.

BHTVIA View 9: Tower of London: Inner Curtain Wall – Martin Tower

205. View 9 is taken from the Inner Curtain Wall of the Tower of London looking northwards across the Outer Curtain Wall, casemates and moat beyond towards the buildings in the City of London. The development site is positioned approximately 390 metres behind the thick band of trees a glimpse of which can be seen between the tree canopies.
206. In this view the walls of the moat with back drop of trees and the buildings of the City of London to the west dominate the view. The proposal is shown as a blue wireline which is almost entirely obscured by intervening existing development and the thick band of trees. Only the top part of the proposed development would be glimpsed, albeit fully screened by the trees at Tower Hill. The tree canopies would provide sufficient screening during the winter months, so that the proposal would not be readily noticed.

207. Overall given its siting, the proposal would have no impact on the view thus preserving all those relevant attributes of OUV and identified landmarks – preserving the relationship with, the City, and the iconic form, silhouette and ‘dominance’ of the Tower of London walls. It would not be harmful to the view, setting or significance of the ToL WHS or its OUV.

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BHTVIA View 10: Tower of London/Tower Green

208. Viewpoint 10 is located at the southwestern corner of Tower Green, facing northwards towards the Royal Chapel of St Peter ad Vincula, approximately 500 m to the south of the Development Site.
209. Views from within the Inner Ward and around Tower Green are deemed by the Local Setting Study to illustrate well the ToL’s significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. It aims to maintain views illustrating the living tradition of the ToL, its rich ceremonial life and unique sense of place apart from the modern City outside the walls, where the relationship between the scale of the individual buildings can be appreciated. It offers guidance that development should (i) respect that sense of place and (ii) ensure that buildings surrounding the Inner Ward remain the focus of the view.
210. In this view with the Victorian Waterloo Block and the White Tower, visible to the right, the chapel forms the northern enclosure of this view. To the left are 18th century town houses. The church tower and parts of the historic fortifications are visible above the chapel. In the foreground are the tall mature trees and lawn of Tower Green which soften the view. Beyond the Tower of London buildings and trees can be seen the uppermost storeys of the Citizen M Hotel and a small sliver of the top of the existing St Clare House with protruding antennae that are seen in the backdrop of the church tower and chapel, respectively.
211. The Proposed Development is shown as a blue wireline. The very topmost part of the building’s silhouette would appear on the skyline above the Royal Chapel of St Peter ad Vincula. The proposal would remove the unsightly antennae of the existing St Clare House and introduces a calmer and less cluttered roofscape that would recede into the background. The proposal would appear as another incidental element of modern development in the backdrop of the view, and would not draw attention away from the the main focus of Tower Green and the buildings that surround it.

212. The Local Setting Study acknowledges that there is a range of views in the Inner Ward. In most of these, the proposal would be concealed behind the northern range of enclosing buildings, having no visual impact.
213. Overall given its siting, discreet presence and calm and orderly architectural design, it is considered that the proposal would have a neutral impact on this view. It would accord with the guidance in the Local Setting Study and thus would preserve all those relevant attributes of OUV and identified landmarks – preserving the relationship with the River, the city, and the iconic form, silhouette and ‘dominance’ of the White Tower. It would not be harmful to the view, setting or significance of the ToL WHS or its OUV.

Conclusion - Impact on Tower of London World Heritage Site

214. The proposal would preserve the ability to recognise and appreciate the Tower of London as a Strategically Important Landmark, whilst according with the associated visual management guidance on the LVMF except for the way in which it would maintain the existing St Clare House’s breach of the Protected Silhouette at 25A.3 and in the kinetic experience between Assessment Points. However, for the reasons set out above, it is considered that the proposal’s impact here would be so imperceptible, and not result in an appreciable worsening of the situation, that it would preserve the ability to recognise and appreciate the ToL.
215. It is considered that in all instances the overall impact would not harm the attributes of OUV or any of the components, authenticity or integrity of the WHS, preserving its significance. The extent of change the proposed development would have on the wider setting would be limited, the impact on the ability to appreciate the site’s OUV would be neutral, and it would not harm the significance of the Tower of London whether in relation to the WHS, the individual listed buildings, or the Scheduled Monument. The proposals would accord with Local Plan Policies CS13, emerging Local Plan policies S11, London Plan Policies HC2, HC3 and HC4 and guidance contained in the LVMF SPG and the LSS.

Other Views

216. As a midrise building, the proposals would not be visible in other strategic or pan-London views. Rather, it would be glimpsed along streets in the locality. The proposed building has been appropriately designed in relation to its surroundings and its quality design and appropriate massing would not detract from the visual amenity of other townscape views. The proposed building would have an appropriate presence in significant views of important buildings, townscape, riverscape and skylines and would not result in harm to the views identified in the Built Heritage and Townscape

Visual Impact Assessment and the settings and significance of the heritage assets and landmark buildings featured within these views would not be harmed by the proposals.

Ibex House 41-47 Minories (Grade II) (BHTVIA views 12, 13, 14, 15, 16, 17)

Significance

217. Ibex House (1937) is a distinctive and stylish example of Art Deco architecture and is of historic and architectural significance. It is the largest surviving example of an Art Deco office building in London that is finished to a high standard of design that incorporates high quality materials. The building is faced with black (to ground floor) and buff-coloured (to upper storeys) faience with continuous horizontal Crittall style windows with glazing bars proving a strong horizontal emphasis. The building was designed by Fuller, Hall and Foulsham, a little know architectural practice, who also designed Blenstock House in Westminster.

Setting

218. Ibex House is located opposite the application site and is among the most striking buildings on Minories. When built, it was among the largest buildings on a street largely consisting of traditional, small historic plots and would therefore have been a dramatic new addition to the Minories. Subsequently the historic grain of its original setting has been diluted by wartime bombing and postwar redevelopment of amalgamated sites, lessening the architectural impact Ibex House would once have had. Nevertheless, it remains one of the most striking buildings on Minories, and the street and its environs continue to possess the commercial character of their later history and isolated small historic buildings such as the Three Lords public house and the Writers House. Consequently, these elements of setting support, in a minor way, Ibex House's historical significance.
219. Elsewhere, the setting of Ibex House is much more fragmentary and modern in character. The railway lines to the east into the Haydon Square goods depot which defined the setting out of its eastern elevation have been lost, as have the finer historic grain of the streets to the north and south (with the aforementioned exception of Writers' House on Haydon Street). These elements do not make any contribution to the significance of the listed building. In particular, the void created by the car park immediately to the north on Haydon Street results in a haphazard and amorphous townscape which detracts from the setting of the listed building.
220. Overall, building's setting makes a limited contribution to an appreciation of the heritage asset's value.

Impact

221. BHTVIA views 12 and 13 illustrate the impact of the proposed development on the setting of Ibex House looking north along Minories. The carefully designed lower blocks reflect the historic scale of buildings that front onto Minories and help to screen the taller elements behind which are similar in height to the existing St Clare House. The introduction of high quality materials including coloured 'glazed' brick as well as contrasting spandrel panels beneath the windows provide articulation and visual interest. The rounded corners reflect those of Ibex House opposite that would help to create a more harmonious and well-designed neighbour.
222. BHTVIA views 14 and 17 illustrate the impact of the proposed development on the setting of Ibex House looking southwards along the Minories. In addition to the benefits highlighted under views 12 and 13 it can be seen that the angling back of the west facade to the southwest corner of the proposals would reveal more of the rounded corner of Ibex House to Haydon Street, increasing the listed building's street presence. In this respect the proposals would result in a slight enhancement to the setting and the architectural significance of Ibex House when seen along Minories.
223. BHTVIA views 15 and 16 show the proposed development looking westwards along Haydon Street. The proposals in these views would introduce additional volume that is broken up into several elements, each with a strong vertical emphasis. Chamfered corners and a stepped roofline ensure visual interest is added that helps break up the visual bulk of the building so that it does not appear overbearing to Ibex House. The impact is further reduced with the high quality elevational treatment comprising glazed brick, articulated spandrel panels beneath windows and balconies / terraces that help to soften the building's appearance.
224. The Proposed Development will introduce a much higher quality building that would create a new street frontage that addresses Haydon Street and Ibex House by enclosing the street whilst removing the townscape gap created by the car park to the west of Writers House. This would reinstate the historic building line in this location and re-establish the sense of enclosure along Haydon Street which was the original setting to Ibex House. Accordingly, in this respect the proposals would result in a slight enhancement to the setting and historical significance of Ibex House when viewed along Haydon Street.
225. Officers consider that while visible, the high-quality replacement building will not diminish the appreciation of the heritage asset and would be a positive enhancement to its setting helping to repair the streetscape and improve its setting. Overall, the proposals would result in a slight enhancement to the setting of the listed building, preserving significance and the contribution made by setting.

Non-Designated Heritage Assets

226. Non-designated heritage assets are 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 heritages assets.
227. The guidance in Historic England's Advice Note 7: Local Heritage Listing has been used to assess whether the buildings on the site have potential for non-designated heritage asset status. Writers House, 13 Haydon Street and the Three Lords public house were identified to have such status as a result of that scoping exercise.

Writers House, 13 Haydon Street (Direct and Indirect Impacts) BHTVIA views 15 and 16

Significance

228. The building now known as Writers House is one of the few surviving historic structures that represents the industrial past of this part of the City, having survived the ruin clearance works of the years after World War II. Victorian in date, the building was heavily altered in the latter part of the 19th century when the front façade was reconstructed. The adjacent buildings have been lost since World War II, leaving the party walls exposed. The building is a comparatively rare survivor, in a City of London context, of this kind of modest Victorian industrial building.
229. Architecturally, the building has an attractive front facade to Haydon Street with its London yellow stock brick façade and red brick dressings, stepped string courses and painted window frames. Internally, the building has been remodelled with most surfaces and finishes being of more recent date. Several historic iron columns are still in place and brickwork has been exposed on some floor levels. Nevertheless, the building's historic architectural design, proportions and features survive reasonably well.
230. Most importantly of all, remnants of earlier medieval structures, most likely from the Abbey of St Clare, have been identified in the exterior walls of the building which have been incorporated into the Victorian wall structures. Recent evaluation work has confirmed that medieval masonry survives possibly up to first floor height below the modern render on the west elevation. GLAAS consider these remains to be of national importance as rare survivals of a rare type of abbey complex used by a community of female friars.

231. For the above reasons Writers House is considered to have rich archaeological, architectural and historic interest justifying its status as a non-designated heritage asset.

Setting

232. The building currently sits isolated from its neighbours with a surface car park to its west and the post war Mansell Street Estate to its east. Its immediate setting has been eroded following Blitz clearance following the Second World War and its original terraced setting along Haydon Street has been lost.
233. The most significant buildings seen within its setting is IbeX House to its south, a significant Art Deco office building, and the post war St Clare House to its north and west. IbeX House is a grade II listed building which is significant as the largest surviving Art Deco office building in London and for its design quality and facing materials. 30-33 Minories, however, is composed of a low brick block and a tall element clad in grey cladding panels which are of low quality, having been built with limited resources in the post-war years and latterly refurbished.
234. The wider setting comprises an eclectic mix of architectural styles with many post war buildings interspersed with more contemporary architecture and older historic buildings of traditional design and materials.
235. The building's setting makes a limited contribution to the appreciation of the asset's value.

Direct Impact

236. Minor works would be undertaken directly to Writers House as part of the proposals. The existing ground floor level façade to Haydon Street would be reconfigured to provide level access from the street. A programme of works to investigate and if feasible reveal the medieval fabric would be undertaken to the west elevation. Otherwise, the building would be left unaltered. These minor works would not in principle be harmful to the significance of the non-designated heritage asset and details of them are reserved via condition, including junctions between the existing building and the new development.

Indirect Impact

237. The proposals will be in the setting of Writers House in views looking west along Haydon Street and are depicted in Views 15 and 16 of the Built Heritage, Townscape and Visual Impact Assessment.

238. The proposals would introduce a building of greater bulk and mass than the existing St Clare House, although comparable to the existing building in height. This additional massing would be broken up into several elements, each with a strong vertical emphasis. Chamfered corners and a stepped roofline would create visual interest that helps break up the visual bulk of the building, which is further mitigated by high quality elevational treatment comprising glazed brick, articulated spandrel panels beneath windows and balconies / terraces that help to soften the building's appearance.
239. The proposals would 'mend' the streetscape, introducing a new frontage that relates to Writers' House infilling the townscape gap to the west currently occupied by a surface carpark. The proposed blocks on Haydon Street step down towards Writers House creating a more comfortable setting with the elevational treatment reflecting traditional Victorian architecture and historic plots sizes. The windows to the east facing elevation are fenestrated adding visual interest and further softening the setting as illustrated in Views 15 and 16 looking west along Haydon Street. In this respect the proposals would be a slight enhancement to the setting of the non-designated heritage asset.
240. The building will benefit from the 'mended' streetscape along Haydon Street and the building's reuse as a community facility. Active frontages and the new public space to the rear will help to animate the street and allow the non-designated heritage asset to be appreciated and in particular those of the local community who will use the building.
241. Officers consider that while visible, the proposals will not diminish the appreciation of the non-designated heritage asset and would be a slight enhancement to its setting and therefore significance.

Other Designated Heritage Assets

242. 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 potentially within the setting of an enormous amount of heritage assets, and it would be disproportionate to assess them all. As part of a scoping exercise, this assessment is in accordance with paragraph 200 of the NPPF and is deemed proportionate and no more than is sufficient to understand the potential impact of the proposal on its significance. In accordance with paragraph 201 a number of potentially affected assets were scoped, accounting for their significance and contribution of setting to that significance. Additional assets assessed include:
- Lloyd's Avenue CA (City of London)

- Fenchurch Street Station CA (City of London)
- Crescent CA (City of London)
- Tower Bridge (Grade I)
- Church of St. Botolph (Grade I)
- Hoop and Grapes Public House (Grade II*)
- 46, Aldgate High Street (Grade II*)
- Sir John Cass School (Grade II*)
- Sir John Cass College (Grade II)
- Gate and end piers and wall to road (Grade II)
- 57 and 59, Mansell Steet (Grade II)
- 48 and 49, Aldgate High Street (Grade II)

243. The settings and the contribution they make to the significance of these designated heritage assets, would not be adversely affected and/or any impact would not be over and above those impacts already identified. The proposed development would not harm the setting or the contribution that the setting makes to the significance of these designated heritage assets.
244. The assets assessed in detail here are considered sufficient to understanding the impact on significance overall.

Heritage Conclusion

245. The proposals, by way of impact on setting, would preserve the heritage significance of heritage assets, and an appreciation of that significance. They would slightly enhance the settings of IbeX House and Writers House. As such, the proposals are considered to accord with Local Plan Policies CS 12 and DM12.1, emerging City Plan Policies S11 and HE1, London Plan Policy HC1, having accounted for and paying special regard to s.66(1) Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF policies.

Archaeology

246. The proposed development is in an area of archaeological interest. The City of London is considered an archaeologically sensitive area in its entirety. In accordance with the City of London Local Plan 2015, all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.
247. The site itself is located above the 13th century abbey of St Clare's (Poor Clares or sorores minores from which the road Minories takes its name) and is also located within the eastern Roman cemetery. Important glass working remains of post-medieval date are also present in the vicinity of the site.

248. The application is supported by an archaeological desk-based assessment (MOLA 2023) and an archaeological evaluation (MOLA 2022). The evaluation demonstrated that remains relating to the abbey and burials from the Roman cemetery survive on the site in the current car park area. Records from the 1950s confirm that Roman burials were found during the construction of the current building. The current lower ground floor could not be evaluated in advance of development, but comparable levels of archaeology suggest that remains similar to those found in the car park are also likely to survive beneath the lower ground floor slab. The remains of the abbey so far identified suggest that floors and upstanding walls of the abbey have been removed and only below ground foundations survive across the majority of the site.
249. During the process of the evaluation the render in three areas against the extant western wall of the Writer's House was removed. Excavations within the Writer's house in the 1980s had identified that some of the abbey walls had been reused during the construction of the building in the 19th century. The evaluation work confirmed that medieval masonry was extant within the western elevation of the Writer's House, beneath the modern render.
250. Part of the proposal is to extend the current lower ground floor into the car park area and excavate an additional basement across part of the site. The extension of the lower ground floor will have a finished floor level of 11.4m AOD, similar to the level of the current lower ground floor. The basement will have a finished floor level of 6.6m OD. No removal of historic fabric is proposed for the Writer's House. Archaeological remains of the abbey and the cemetery were identified at c. 10.70m AOD. It is likely therefore that the construction of the new lower ground floor will have a moderate impact on the archaeological remains and that the new basement will have a high impact.
251. The Archaeology Adviser from Historic England has been consulted and advises that the Roman cemetery is of high significance, it covers a fairly large area of this part of the City and archaeological excavation of the remains within the site will enhance our understanding of the cemetery. St Clare's abbey is not well understood and previous excavations have not been fully reported on. Although there are other abbeys dedicated to the Poor Clares in England, this type of community of female friars is relatively unusual. The below ground remains of the abbey are likely to be fragmentary and have been truncated by both the current building and by 19th century basements, thus reducing their significance. However, the remains in the current lower ground floor have not yet been examined and survival may be better. The proposed development should therefore allow for any ruins of the abbey that are located within the footprint of the current lower ground floor and car park to be displayed to the public if they

demonstrate a good survival of legible structures. Appropriate methods for preservation in situ of these remains should be provided. The display of any findings to the public would be secured by appropriately worded conditions.

252. The Archaeology Adviser also recommends that where there are known upstanding remains of the abbey, within the walls of the Writer's House, these remains are of national significance as they would have been experienced every day by the occupants of the abbey in a way that the foundations would not have been experienced. Modern render has been used to cover the upstanding medieval walls externally. This render should be removed by a conservation specialist and advice sought on whether the render should be replaced with something more sympathetic, prior to the western wall elevation becoming inaccessible once the new building is constructed. If, once the render is removed, the wall proves to be in good condition then it should be displayed to the public as part of the new scheme, either in Writer's House or in the new building to the west. This requirement would be secured by condition.
253. In light of the above, it is clear that the proposed development will cause some harm to archaeology. This harm can be minimised through foundation redesign where appropriate and partly compensated for by an enhanced programme of public benefit. A programme of public benefit regarding the heritage of the site has been proposed in the Cultural Plan. As stated above, it is suggested that any archaeological findings would be permanently displayed within Writers House. The site provides a good opportunity to enhance understanding of the eastern cemetery but also to tell the story of the Poor Clares and provide interpretation relating to the abbey. It is therefore advised by the Archaeology Adviser that a number of public benefit proposals are secured by condition, including, but not limited to the following:
- Full excavation of the remains of the abbey and cemetery in areas of proposed impact
 - exposure and display of the abbey walls within the Writer's House
 - a synthesis of previous excavations of the abbey to be included within the reporting for the proposed archaeological excavation works within the new basement
 - provision of open days and tours of the excavation whilst in progress, particularly reaching out to local communities
 - exhibition of the finds from the site and nearby sites at the Writer's House
 - interpretation boards within the new development
 - information about the excavation provided on the hoarding during the work
 - educational outreach

- if discovered, display of well-preserved structural remains of the abbey within the new development
 - preservation of the displayed remains in situ with appropriate monitoring and maintenance
254. NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. Paragraph 200 requires that applicants provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. It is also stated that “Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.
255. Core policy CS12 of the Local Plan requires the protection and promotion of the evaluations and assessment of the City’s archaeological remains and their setting, including interpretation and publication of results of archaeological investigations. The preservation, protection and safeguarding of the archaeological remains and their setting and their public display and interpretation is a requirement of policy DM 12.4 of the Local Plan.
256. In light of the above it is considered necessary that the series of conditions are imposed to ensure appropriate archaeological assessment, evaluation, retention and display, if appropriate. Subject to these considered it is considered that the impact of the development on archaeology will be mitigated and where appropriate enhanced.

Public Access and Inclusivity

257. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy D5 of the London Plan. In 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.
258. The application is accompanied by an Access Strategy submitted as part of the Design and Access Statement. It is stated that the aim of the development is to achieve an inclusive environment throughout.

Arrival at the Site

259. Consideration has been given to the points of arrival at the site. The Access Advisor has suggested that an Access Management Plan to provide preview information for visitors and building users on points of arrival and entrances would be required. This would be secured by condition.

Cycle Provision

260. Cycle entrance for the building at 30-33 Minories would be provided onto Haydon Street and would be 1500mm, wide and automated. 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. Another Cycle entrance is proposed onto St Clare Street which provides level access. The submitted plans show that a number of spaces for larger bicycles would be provided. Provision for a recumbent bike is shown at basement level next to accessible welfare and changing facilities.
261. It is noted that 5% of cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1 guidance. Wheelchair-accessible sanitary and changing facilities are also necessary. On the submitted plans these appear to be provided within the redeveloped building in close proximity to the cycle entrance lift.
262. 15 Sheffield stands and a further 15 wider set Sheffield stands for the long-stay storage. However larger spaces should also be provided for shorter stay use. The provision of a cycle lift capable of accommodating larger cycles and accessible changing facilities adjacent to the accessible cycle spaces is welcome, and should also include accessible locker space.

Entrances

263. The Access Statement details the entrances to the different units and confirms that they will all be step free with a clear opening width of at least 1000mm. The entrance from Minories is confirmed being drum doors with bifold doors and a pass door of 1000mm, which is more inclusive than a revolving door.
264. Although not ideal in terms of inclusivity to all users, a platform lift is proposed for the new build entrance from Sheppey Place, which would still be able to provide access to the main office reception and lifts.
265. The entrance doors to Writers House from Sheppey Place and Haydon Street, whilst both over 1500mm, are not currently proposed to be power-operated. Automated doors would be more inclusive of a range of people and reduce barriers to access and would be encouraged. An informative would be added in that respect.

266. The proposed provision of manifestations is considered appropriate, alongside the confirmed thresholds, mat wells and floor finishes.

Vertical movement in Writers House

267. At present no step free access is provided at Writers House. Part of the proposed development is to refurbish the building and provide a step free access. The Step-free access between ground and lower ground floor levels of Writer's House will be via a new platform lift. Although platform lifts are not considered inclusive to all users, they are acceptable in exceptional circumstances, such as this one, where there is an existing building. Some of the newer generation of platform lifts are better aligned with standard passenger lifts in terms of operation. The details of platform lift would be reserved by condition.
268. The submitted plans show that the existing core of Writers House is to be retained. It is understood that this is smaller than 1100x1400mm, which is the minimum for a wheelchair user and accompanying person, and so is not consistent with current standards and best practice.
269. 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.
270. The Access Statement refers only to step-free access to the ground and lower ground floors, which relates to the cultural/community use, and for which a platform lift is proposed. There would not be step-free access provided for the affordable workspace on the upper floors and consequently these spaces would not be accessible to a range of people.
271. Whilst it is accepted that the upper floors would not be subject to a change of use, it is considered reasonable that provision is made for an accessible lift to wheelchair users to provide access to the affordable office floorspace. Inclusive design is at heart of the both the London and Local Plans and therefore, officers are of the view that a wheelchair accessible lift should be provided to give access to the affordable workspace at Writers House to achieve the highest standards of accessibility and inclusive design. This will be secured by the imposition of a condition.

Horizontal Movement

272. It is confirmed that access corridors will have a minimum width of 1500mm and this is acceptable.

Terraces and garden spaces

273. The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind.
274. The Access Advisor has identified a number of features that could potentially create disabling barriers, such as stepping stones. It is noted that the details of Hard and soft landscaping will be secured by condition.

Sanitary Facilities

275. It is confirmed that unisex accessible toilets will be provided on all floors, with handed units on alternate floors. Gender neutral cubicles, an ambulant disabled cubicle and an accessible cubicle are provided on all levels of the principal development.
276. Toilet provision for Writer's Houe includes one accessible toilet at lower ground floor level. It appears that there is no accessible toilet provision for the upper floors identified for the affordable workspace. For similar reasons stated above and in order to provide the highest level of accessibility and inclusivity in the design of the proposed new and refurbished buildings, it is considered that an accessible toilet should be provided for the upper floor affordable workspace.

Signage and Wayfinding

277. 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.

Public Access and Inclusivity Conclusion

278. Overall, and subject to the imposition of conditions securing the provision of a wheelchair accessible lift and sanitary facilities for the proposed affordable workspace at Writers House, the proposal would accord with the access policies outlined above.

Community/Cultural Strategy

279. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 Strategic Policy S6 encourage new cultural experiences and art works. Local Plan

policies CS22 and DM 22.1 support the provision of community services. It is advised that development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses. Similar requirements are set in Draft City Plan 2036 policies S1 and HL5.

280. A Community Strategy has been submitted with the application. The Community Strategy has been prepared in partnership with Museum Of London Archaeology, Arbeit Studios and Poplar HARCA with the aim to deliver an offer with social impact to the local community and also supports the City's vision of becoming an international hub with diverse cultural appeal. Engagement has taken place with a number of stakeholders including the residents of the Guinness Estate and the Ward Councillors.
281. The proposed development would involve the provision of a cultural/ community facility at lower ground and ground floors of Writers House, with affordable workspace to the upper floors. This is designed flexibly to provide a wide range of community and cultural activities including creative workshops for the community, such as music, art and drama classes, larger social events, community gatherings at both Writers House and Sheppy Place, cultural events focusing on the historical significance of the site, tutoring/training courses, health and wellbeing sessions, social group activities and evening youth activities. A public art installation is proposed to be commissioned by local artist to be displayed at Sheppy Place.
282. Archaeology would be a core part of the Writers House as a cultural destination. As part of the proposals, if feasible, the archaeological remains in the west wall would be revealed, conserved and displayed to the public as part of the creation of a new exhibition centred on the Poor Clares, a rare and little-understood community of female friars that once occupied buildings on this site. Even if the remains in the west wall cannot be exposed, this story will be told through the recovery and display of artefacts from the site and a new programme of interpretation.
283. As part of the submitted strategy a community/cultural programme of a meanwhile use has been presented. This will include a range of activities that have been designed in line with the Community Strategy vision. A Heritage Display will be hosted by MOLA curated by the local community, in partnership with Poplar HARCA. A photography exhibition will be created by the local youth community with guidance from MOLA. The programme has been designed to provide community talks tailor-made to the diverse community. The events aim to generate interest, establish community investment and earmark Writers House as the hub of community engagement.
284. In terms of governance, the submitted strategy states that the Writers House Community Interest Company will be established as a new organisation with local representation, which will work for the benefit of the

local residents and also hold the lease of Writers House. The studios/affordable workspace on the upper floors will be managed by Arbeit Studios and the community offer of the ground and lower ground floor will be managed by Poplar HARCA. The details of governance will be secured by S106 obligations.

285. The Cultural Consultant has reviewed the submitted Community Strategy and recognised that the ideas provided in the strategy are welcomed and are supported. However, there are elements that are still unclear and clarifications would be required to be secured through the S106 agreement. The following points would be required to be considered and clarified:

- clarity about the business & operational model including risk assessment
- opening hours
- elements, in any, of the development that would be free to access or their cost if not free
- an explanation as to how the spaces will work from a user point of view including safeguarding of children and vulnerable community members
- anticipated external hiring revenue
- the way that the community hub can support & join up with Destination City/other events from City stakeholders
- detail about the proposed meanwhile project including indicative resources

286. It is therefore considered that, subject to a Community/Cultural Implementation Strategy being secured in the S106 agreement to secure a year-round Cultural Programme which would establish monitorable deliverables in curation of the spaces for education outreach, sharing of knowledge, cultural activities and events which would respond to the needs of the local area and be informed by a continuing dialogue with stakeholders, the local community and building users, the policies referred to above would be complied with.

Highways and Transportation

Public Transport

287. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. Aldgate Underground (Metropolitan & Circle Line) is located approximately 250m north of the site, while Tower Gateway Underground Station (Docklands Light Railway) is approximately 200m south of the site and Tower Hill (Circle and District Line) 350m south west. These stations provide good connection to destinations across all London. Fenchurch Street National Rail and

Underground Station is approximately 500m west of the site, providing rail connections to the East as well as Docklands Light Railway. The nearest disabled accessible bus stop to the site is less than 50ms away, providing multiple buses to Charing Cross, Dulwich, Shadwell and Nunhead.

Trip generation

288. Within the Transport Assessment 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 6B which are considered suitable comparator sites. The assessment assumes that all existing trips for the retail uses are linked trips or pass by trips associated with an existing journey rather than trips in their own right which is considered an appropriate assumption. For the proposed development an assumption that 30 per cent of the trips associated with the retail floorspace would be trips generated in their own right and given the nature of the proposed retail function this is considered appropriate. As assessment of the trips for with the proposed Heritage Garden has also been undertaken which is based upon a maximum capacity of 207 people. This identifies a peak level of activity of 180 two-way trips during 21:00-22:00 period.
289. It is proposed to operate a consolidation management strategy for the proposals, where most deliveries are sent to an off-site consolidation centre, where they would be consolidated onto vehicles to be delivered to the Site. This can help to reduce the number of vehicles travelling to the site by more than 50%. A 50% consolidation reduction has therefore been applied to the Office floor space. A 25% reduction has been applied for the retail and community/leisure floor space, to account for any items which are more difficult to consolidate

Land Use	Trips (Arrivals)	Trips Following Consolidation
Office Use	36	18
Town Centre Uses	12	9
Cultural/Community	3	2
Flexible Office	2	1
Total	52	30

290. The Assessment identifies that the proposed development as a whole would generate 431 trips during the AM peak (8:00-9:00) and 431 trips during the PM peak (17:00-18:00), with a total of 3,239 daily trips being generated. This is an increase 193 trips during the AM peak (8:00-9:00) and 185 trips during the PM peak (17:00-18:00). Given the accessibility of the site in relation to local public transport services and when considering the projected mode share of trips, subject to appropriate mitigation and improvements to local footway conditions, it is considered that this additional level of activity could be absorbed by the existing Transport network.

Public Footpath, Public Realm Alteration and Access

291. The outline of the building is proposed to change as part of this application, below in Fig1 and Fig 2 you can see the main pedestrian access for the larger office along with retail units is proposed as step free on the West side of the building, with the pedestrian access for Writers House maintained on the South side on Haydon Street.
292. The frontage along the Minories is to be set back, which would create a wider public footpath along the West side of the building and also along the southwest corner of the property. This will help to improve the pedestrian comfort levels along this area. The additional land would be kept within private ownership, so this would not be adopted however it would be maintained for public access and movements.
293. The Haydon Street car park on the South side of the building would be removed, this is welcomed as will reduce vehicle trips to and from the area. There is also additional private car parking on the north side of the site accessed via St Clare Steet. This area is proposed to be repurposed to facilitate additional access into the building via pedestrians, access for cycle storage and to provide servicing facilities for the site.

17.

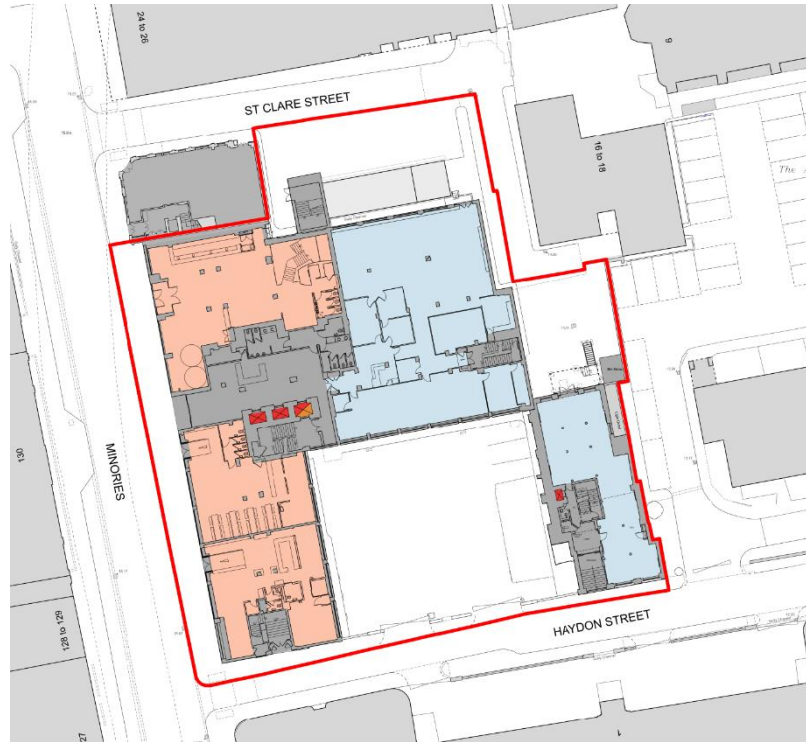


Figure 6: Existing Ground Floor

18.

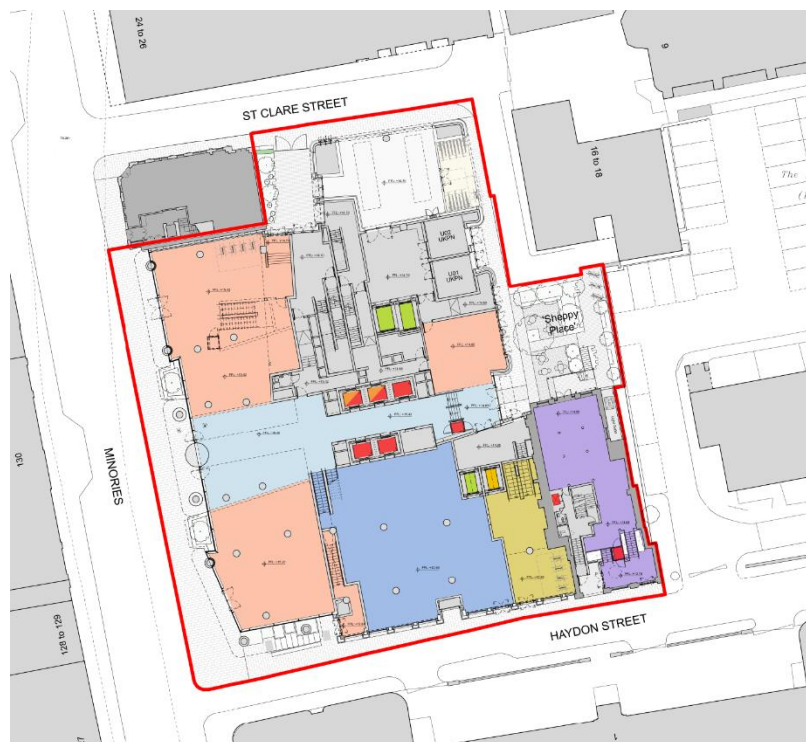


Figure 7: Proposed Ground Floor

Servicing

294. The proposed development will be car free. As a result, all vehicle trips generated by the development will be associated with delivery and servicing. It is proposed to provide an on-site service yard at the northern edge of the Site, with direct access from St Clare Street. The proposed

service yard has been designed to accommodate delivery and servicing vehicles, including refuse vehicles.

295. It is expected that up to 30 vehicle movements a day would be generated by the site, it is considered that two servicing bays are sufficient to accommodate these movements which should all take place off the public highway with vehicles reversing onto site and exiting in a forward gear. A swept paths assessment has been provided by the applicant and are deemed as acceptable. The applicant has also agreed to limit servicing hour to outside of peak hours to reduce impact on the public highway, so no servicing will take place between 07:00-10:00, 12:00-14:00 and 16:00-19:00 in accordance with policy.
296. However, the development will still produce significant enough movement of goods and services to require a Service Management Plan to be applied as an Obligation in order to meet London Plan policy T4 and Local Plan Policy 16.1.

Disabled Motor Vehicle Parking

297. Allocated space has not at this point be made for the provision of disabled motor vehicle parking. It is acknowledged that local disabled parking is available on the local highway as mentioned in the submitted Transport Assessment. However, blue badge bays on the public highway cannot be guaranteed for employees or visitors accessing the proposed development. The blue badge bays less than 50 metres walk to the building are limited to a maximum stay of 4 hours, which also makes them unsuitable.
298. CoL's Local Plan DM16.5 outlines that's "*designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use.*" TfLs The London Plan T6.5 outlines that "*all non-residential elements should provide access to at least one*" Blue Badge Bay.
299. Therefore suitable alterations would be required to be made to the plans to provide at least one disabled parking bay in accordance with the design standards as set out in T6.5 of the London Plan, 16.5 of the Local plan and British Standards 8300. The provision of one blue badge parking bay on site will be secured by condition.

Travel Plan

300. The CoL is an extremely busy area and this development would lead to a large increase in numbers traveling to and from the site with an expected uplift in jobs of over 2,000 people.
301. In this instance we would seek to mitigate the impact on this development by requesting a Workplace Travel Plan be put in place, this will not be required to cover the retail areas of the site as it does not meet thresholds to be needed. Travel Plans are an effective tool for managing visitors, volunteers and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.
302. A Workplace Travel Plan would need to be secured as a section 106 planning obligation in order to meet London Plan policy T4 and Local Plan Policy 16.1. The travel plan would need to be approved by the CoL prior to completion of the proposed works. This would include a requirement for a Travel Plan Co-ordinator to be appointed no less than 3 months before occupation.
303. Transport for London encourages developers to use the TRICS database for trip generation predictions. We will require the applicant to undertake a TRICS after study and provide TfL and the CoL with the results on completion of the development. TfL would then be able to update the TRICS database with the trip generation results for the various use categories associated with this development, after the operational surveys and results would be secured by Section 106 agreement as part of the Travel Plan review and monitoring process.

Cycle Parking

304. 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.
305. The level of cycle parking proposed as part of the development exceeds compliant based on the London Plan requirements for long stay parking, however it fails to meet the requirement for short stay parking as shown in the table below.

London Plan long stay parking requirements	Proposed long stay cycle parking	London Plan short stay cycle parking requirements	Proposed short stay cycle parking
304	305	41	22

306. The short stay cycle parking is currently proposed inside the two main entrance halls for the Minorities and Writers House, as well as to the rear of the building on the new space known as Sheppy Place. While the current proposal does not meet minimum requirements as outlined in the London plan, we would not consider this a reason for refusal on the requirement that additional engagement can take place with the Local Planning Authority to identify additional areas for short stay cycle spaces within the application site. A condition is therefore recommended to require the provision of the policy compliant number of short stay spaces.
307. The long stay cycle parking for all the Minorities is proposed at basement level is available via two cycle lifts and a staircase. 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 officer are satisfied that it has sufficient capacity. The proposals include 234 two tier stands spaces, 29 folding bike lockers, 2 accessible stands and 30 Sheffield stands spaces. This mix of spaces is welcome and would ensure the storage is attractive and easy to use for all potential users of this facility. To ensure the cycle parking provided is of the highest quality and design standards full details of the final cycle storage layout will be secured by condition.
308. Showers and lockers for all other users would be located within the basement, accessed via stairs or lifts. It is proposed to provide a total of 293 lockers (1 locker per cycle space) and 29 showers (1 shower per 10 spaces). The proposed level of provision accords with policy requirements. Facilities such as drying racks, a repair station and charging facilities for electric cycles would also be provided.
309. Long stay parking for the Writers house will be located at ground floor level which can be easily accessed step free via St Clare Street. The full provision required of 12 long stay spaces will be provided via two tier stands spaces. To ensure the cycle parking provided is of the highest quality and design standards full details of the final cycle storage layout will be secured by condition.
310. It must be noted that the visitor cycle parking overflow cannot be guaranteed to be placed on the public highways and will be subject to further consultation and design requirements. The cost of these works if required will be included within the highways works, as part of the Section 278 Agreement.

Over sailing and basement alterations

311. A significant amount of excavation will be required as part of the alterations to the basement level, as this is within close proximity of the

public highway it will be required that an Approval In Principle (AIP) from a highways and bridges team will need to be sought prior to commencement of any construction. It should also be noted that the proposals outline over sailing of the public highway at the first floor level, and this will also require an AIP prior to commencement of construction. Should planning permission be granted an AIP will be required to be set as a condition.

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

312. The proposal would involve a significant amount of demolition and construction works. 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 proposal is also likely to lead to a variety of amenity issues in the immediate vicinity (e.g. noise, vibration, air quality).
313. London Underground while not objecting to the application have expressed concerns about the demolition and construction stage and has asked that a separate Demolition Logistics Plan (DLC) be set as a condition should planning permission be granted and that this include but not limited to the following:
- Provide an overview of the overall development including both design on temporary and permanent works.
 - Provide detailed design and Risk Assessment and Method Statement (RAMS) for the demolition works.
 - Identify and accommodate the location of the existing London Underground structures.
 - Demonstrate that any EMC emissions from any plant or equipment to be used on the site or in the finished structure will not adversely affect LU equipment or signalling.
 - Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works.
 - Assess structure/tunnel impact due to ground movement arising from different stages of temporary and permanent works. Mitigate the effects of noise and vibration arising from the adjoining railway operations within the structures.
314. A preliminary Construction Logistic Plan (CLP) has been submitted in support of the planning application. This provides useful information to describe the proposed works and how they would be undertaken. It also provides useful information to describe how the impacts associated with the construction period would be mitigated. It lacks detail but is a good example of what is required at this stage in the process. A more detailed CLP and DLP 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/>

315. The CoL 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 CLP and a DLP would be secured via conditions to ensure the construction and demolition of the site is in accordance with The London Plan Policy T7 and DM16.1 of the CoL Local Plan. This would provide a mechanism to manage/mitigate the impacts which the proposed development would have on the local area. The CMP would need to be approved prior to works commencing on site.

Additional TfL comments.

316. In addition to comments already addressed in this report TfL have also requested the following. *“TfL considers the main development impact will be increased pedestrian flows on the Minories towards nearby railway stations, with increased use of the Cycle network in the future. Accordingly, TfL would support contributions for public realm and cycling improvements for routes to Liverpool Street, Fenchurch Street, Tower Gateway and Aldgate East as a minimum.”*
317. While we support TfL's goal to make improvements to links through the area, they have not provided any details on what changes they would like

to see, costing or justification for the proposed contributions. Therefore, it is considered that sufficient mitigation to offset the impact of the development has been put in place and no further contributions would be necessary to be requested.

S278 & S38 Agreements

318. The proposed development would involve some alterations in the building alignment alongside the public highway. At the front pedestrian access of the main building on Minories the building at ground floor would be pulled back in order to improve pedestrian permeability, most notably the building shall be pulled back on the south-west corner of Minories and Haydon Street.
319. It is not considered that it would be of a public interest to adopt the additional land by the entrance of the main building, since this land can be maintained by the landowner while still being kept available for public use. However, it is considered that there is benefit to the wider public to adopt as public highway the land on the southwest corner, since this space is closer to a junction and could allow for improvements in the future. Total land of new adopted public highway would be 30.9sqm.
320. To the rear of the building on St Clare Street it is proposed that the building line be moved out encroaching on the public highway by 15m². Policy DM16.2 states that "*The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided.*" In this instance it is considered that these proposals provide better standards to the public highway overall.
321. While public space would be lost on St Clare Street, the space lost would be minimal and is currently unusable, as it is a footway that measures circa 0.2 metres in width, which means that this is effectively unusable for pedestrian movement. The new proposed space on Minories would be more valuable due to the significantly higher footfall and the increase in potential for alteration to the junction.
322. It is also considered that the overall impact of these proposals will have a net benefit to the public highway which include:
- A reduction of general car parking spaces of 15 spaces reducing vehicle trips in the area,
 - A plan to consolidate servicing vehicles movement and a new provision of off-street servicing bays,
 - Provision of high quality long and short stay cycle parking including showers and locker facilities,
 - And the introduction of new public space known as Sheppy Place

323. As part of the above outlined alterations to the public highway, the applicant has also agreed to enter into a section 278 agreement with the highways authority in order to redesign St Clare Street to improve access and permeability for all.
324. The applicant is required to enter into a Section 278 and S38 Agreements of the Highways Act 1980, prior to the occupation of the site for the following works, but not limited to:

St Clare Street

- Reinstatement of the carriageways in cobblestone
- Reconstruction/formation of footways in Yorkstone paving
- Provision of crossovers
- Removal of redundant dropped kerbs
- Alteration to the public highway boundary
- Additional pedestrian space provided

Minories

- Reinstatement of the footways fronting the site in Yorkstone paving
- Resurfacing of the carriageways fronting the site
- Improvements to pedestrian crossing points

Haydon Street

- Widening of the footways fronting the site along with accommodation works, to suit new site layout and achieve acceptable pedestrian comfort levels
- Resurfacing of the carriageway fronting the site

Corner of Minories and Haydon Street

- To be dedicate as public highway

325. Development requiring works to the highway following development will be secured through the S278 agreement to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces.

CONCLUSIONS

326. The proposals are acceptable in transport terms subject to the necessary conditions and obligations as discussed above.
327. Should planning permission be granted the following S106 planning obligations and conditions, along with a s278, would need to be secured:

- A condition to secure a Demolition Logistic Plan (DLP). The Section 106 agreement shall state that the DLP 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.
- A condition to secure a Construction Logistic Plan (CLP). The Section 106 agreement 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.
- A Section 106 planning obligation to secure a Workplace Travel Plan (TP) for the development. The Section 106 agreement shall state that the TP shall be approved prior to the first occupation of the site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. The Section 106 agreement shall require the applicant to undertake a TRICs after survey and to provide TfL and CoL with a copy of the results as part of the travel plan review and monitoring process.
- A Section 278 agreement to secure public realm improvement works in the general vicinity of the site and any other works deemed necessary to integrate highways arrangements.
- A condition requiring the provision of 305 long stay cycle parking spaces, 41 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.
- A Section 106 planning obligation to secure a Delivery and Servicing Management Plan (SMP). The Section 106 agreement shall state that the SMP shall be approved prior to the first occupation of the site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority.

Environmental Impact of Proposals on Surrounding Area

328. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2036 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Wind Microclimate

329. Policies DM10.1 of the Local Plan 2015, Policy S8 of the draft City Plan 2036 and Policy D8 of the London Plan seek to optimise wind conditions in and around development sites. The design of development should avoid unacceptable wind conditions.
330. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimatic Guidelines for Developments in the City of London.
331. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining suitable conditions for frequent sitting, occasional sitting, standing, walking and uncomfortable.
332. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
333. In considering significance and the need for mitigation measures, if resulting on-site wind condition are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
334. Assessments have been carried out for both the windiest season and the summers seasons.
335. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance, this would be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessment is to give the broadest picture and to ensure that in either test the conditions are acceptable.
336. Three scenarios have been tested:

- Existing site, existing surroundings conditions
- Proposed development, existing surroundings conditions
- Proposed development, cumulative surrounding conditions

Existing Baseline Conditions

337. In the existing baseline conditions the wind tunnel tests and CFD show that the conditions around the site satisfy the safety criteria for wind and are suitable for their intended use except for the outdoor seating area just off the western façade of Canopy by Hilton which sees a marginal exceedance of the 'occasional sitting criteria, and the recreational space on the western terrace of Iveagh Court, which experiences exceedances of the 'occasional sitting' criteria.

Proposed development with existing surrounding conditions

338. In terms of safety, the wind tunnel tests and CFD show that there would be a negligible impact as the wind conditions within the site and surrounding areas all meet the safety criteria for intended uses.
339. In terms of off-site impacts, both the wind tunnel tests and CFD demonstrate that at pedestrian level in the surrounding area are suitable for their intended uses, whether as throughfares, entrances or recreational spaces. There is a minor exceedance of the City Lawson Criteria for occasional sitting still exists at the outdoor seating area just off the western façade of Canopy by Hilton, however, it is acknowledged that this is similar to the existing baseline condition.
340. The wind tunnels tests and CFD demonstrate that the on-site entrances are predicted to be suitable for at least standing, and as such acceptable for their intended uses.
341. In respect of the on-site proposed terraces and balconies summer comfort has been tested and annual distress has been tested. The wind tunnel test and CFD results set out there would no areas of unacceptable distress and as such, the significance of the wind conditions on the private terraces and balconies is therefore negligible. In terms of comfort on the proposed terraces, the wind conditions are largely suitable for 'Frequent and Occasional Sitting'. The terraces on levels 06 (southeast corner), 09 (northwest corner) and 10 (southern edge) experience localised 'Standing' conditions. In terms of comfort on the proposed balconies, the wind conditions are suitable for 'Frequent Sitting', with the exception of the top balconies on the west side for which 'Occasional Sitting' conditions are noted. The reports note that as private terraces and balconies, the impact can be controlled by the inclusion of vegetation or local planters to break

up the wind. Both the terraces and balconies are suitable for their intended use.

Proposed development with cumulative surrounding conditions

342. In terms of safety, the wind tunnel tests and CFD show that there would be a negligible impact as the wind conditions within the site and surrounding areas all meet the safety criteria for intended uses.
343. Both the wind tunnel test and CFD demonstrate that in terms of comfort, the wind conditions within and around the site remain materially similar as the proposed development with the existing surrounding conditions scenario (set out above), and as such suitable for intended uses with the exception of the more exposed terraces and balconies.

Wind Microclimate Conclusion

344. Conditions in and around the site fulfil the wind safety criteria after the introduction of the proposed development and are also comfortable for intended uses, with some exceptions at terraces and balconies which are exposed to south-westerly winds. Even when considering the cumulative surrounds, wind safety criteria are still met, and wind conditions remain the same from a comfort perspective.
345. In terms of ground-level conditions during winter and summer the wind conditions across the site remain the similar to the baseline scenario, which are considered acceptable. Of particular note are the wind condition at 'Sheppy Place', which would be suitable for 'sitting' activities even during winter. The proposed scheme has a Negligible impact on the surroundings. In terms of the proposed development entrances wind conditions would be suitable for 'Occasional Sitting' or 'Standing'. In terms of roof terraces and balconies, it is noted that they will be suitable for 'Frequent or Occasional Sitting' activities during summer, with the exception of localised 'Standing' conditions, as discussed above. No regions of unacceptable wind distress are observed.
346. Overall, the wind microclimate impact of the proposed development is considered acceptable. A Wind Audit would be secured in the S106 Agreement which would require a post-completion audit to assess and compare the results in the Wind Tunnel test against the result of wind speed assessment carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the wind tunnel tests and CFD.

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

Daylight, Sunlight, Overshadowing

348. 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.
349. Local Plan Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.
350. Draft City Plan Policy DE8 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of the Building Research Establishment's guidelines.
351. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the Draft City Plan states when considering on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.
352. The BRE guidelines "Site layout planning for daylight and sunlight - A guide to good practice" (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light:
- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide states that diffuse daylighting of an existing building may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.

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

Interpreting results

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

Overshadowing

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

Assessment

355. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) Guidelines and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE8 of the draft City Plan. Policy D6D of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. Although the impact of the development on existing non-domestic buildings has not been assessed, it is considered that loss of daylight and sunlight on non-domestic uses, such as hotels, is not as harmful as that on residential uses, due to the temporary nature of accommodation. The BRE guidelines can be used to assess whether daylight or sunlight levels may be adversely affected. Local Plan policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The draft City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is

appropriate for its context and provides acceptable living standards taking account of its context.

356. The residential buildings to be considered are those at:
- Marlyn Lodge, Portsoken Street to the southeast
 - 27 Minorities to the northwest
 - Hamalworth House, 9 St. Clare Street to the northeast
 - Minorities London to the northeast
 - Fenchurch House, 136-138 Minorities to the west
 - 140 Minorities to the west
 - St John's House, 124-127 Minorities to the southwest
 - Guinness Court, Mansell Street to the east
 - Iveagh Court, Haydon Walk to the east
 - Emperor House, 35 Vine Street to the west
357. Three commercial receptors have been identified (Hotel indigo to the northwest, Hotel Motel One to the northwest and The Chamberlain Hotel to the west); however, the impact on their daylight and sunlight has not been assessed. Although the impact of the development on existing non-domestic buildings has not been assessed, it is considered that loss of daylight and sunlight on hotels is not as harmful as that on residential uses due to the temporary nature of accommodation. It is therefore not considered that the development would result in an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation.
358. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance in forming a judgement on whether the design of the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (London Plan policy D6D), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan policy DM 10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (draft City Plan policy DE8) it is appropriate to have regard to the assessment carried out in accordance with the BRE guidelines.
359. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-

domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same policy test requirements as residential premises. The dense urban environment of the City, is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight.

Daylight and Sunlight

360. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or the NSL guidelines are not met.
361. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).
362. Both the London Plan 2021 and the draft City Plan 2036 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.
363. The applicant has submitted a Daylight, Sunlight and Overshadowing report and a Daylight and Sunlight Radiance Addendum. A third party review was then commissioned by the Local Planning Authority to review the findings of the reports. The advisor has considered the impacts against the following methodology.
 - 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 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 in the BRE Report, the impact is assessed as minor, moderate or major adverse.
- Factors tending towards a minor adverse impact include:
 - only a small number of windows or limited area of open space are affected
 - the loss of light is only marginally outside the guidelines
 - an affected room has other sources of skylight or sunlight
 - the affected building or open space only has a low level requirement for skylight or sunlight
 - there are particular reasons why an alternative, less stringent, guideline should be applied, for example a window standing unusually close to the boundary.
- Factors tending towards a major adverse impact include:
 - a large number of windows or large area of open space are affected
 - the loss of light is substantially outside the guidelines
 - all the windows in a particular property are affected
 - the affected indoor or outdoor spaces have a particularly strong requirement for skylight or sunlight, for example a living room in a dwelling or a children's playground.

364. Of the buildings assessed, Hamalworth House, Iveagh Court and Emperor House (35 Vine Street), were assessed as experiencing a negligible effect within the BRE Guidelines. The impact on the remaining buildings is outlined below.

27 Minorities

365. This is mixed use property with a pub at ground floor and residential units above fronting the application site, located to the north-west flank of the proposal site.

366. The submitted daylight and sunlight report has analysed a total of 11 daylight openings on the envelope of this property: six windows on the east façade and three rooflights all of which would have a view towards the proposed development, and two windows on the north façade that face away from the proposed development. Actual room layouts appear to have been used in the analysis of daylight distribution.
367. Results suggest that all six windows on the east façade would fail to meet the vertical sky component (VSC) guidelines. Reductions would be substantial, of up to 98% compared to the 20% guideline, and retained VSC values would be as low as 0.2%. All other windows and rooflights would meet the guidelines.
368. Daylight distribution (no sky line) has been analysed by for the six rooms that have windows on the eastern elevation. Results suggest that two of these would meet the daylight distribution guidelines. The other four failing to meet the guidelines appear to be bedrooms, and the percentage area able to receive direct skylight would be reduced to as low as 1%, a relative reduction as high as 99% compared to the 20% guideline. Therefore, the VSC and daylight distribution results in the submitted report indicate major adverse impacts on daylight to 27 Minories.
369. With regard to loss of sunlight, the report has analysed four windows and three rooflights, serving two rooms. Results suggest that one of the rooms, a kitchen, would entirely lose winter sunlight and experience a 69% loss in annual sunlight from 58% as existing to 18% with the proposed development in place. The other room, a kitchen/diner, would meet the guidelines overall, although a window and a rooflight would individually be impacted beyond the guidelines. Overall, loss of sunlight to 27 Minories is assessed as negligible because the affected room is a kitchen and not a living room to which the guidelines would apply.
370. As highlighted in the submitted report, this property appears to have windows that are unusually close to the site boundary and taking more than their fair share of light. For such cases, the third party review report states that, to ensure that new development matches the height and proportions of existing buildings, the VSC, daylight distribution, and sunlight targets for these windows could be set to those for a 'mirror-image' building of the same height and size, an equal distance away on the other side of the boundary.
371. The applicant's daylight and sunlight report includes in its Appendix 2 a graphical representations of a 'mirror-image' building. The VSC results of the 'mirror-image building' methodology indicate major adverse impacts on the windows on the east elevation of 27 Minories. The windows from 1st to 4th floors serve bedrooms and they are the sole source of light, whilst the

windows at fifth floor serve a kitchen/diner window and they are not the only source of light, given that there are windows on the north elevation providing light to this room. Given that bedrooms, by reason of their nature and in accordance with the BRE guidance, do not need as much daylight as living rooms, and considering their position, relationship with the application site, orientation and dense nature of development in the City, it is considered that in these circumstances the impact would not be detrimental to extent that would warrant refusal of the application on those grounds. The impact on the fifth floor windows would be less harmful, given that the windows on the east elevation of the kitchen/living room are not the only source of light to this room. It is therefore considered that the impact would be in these circumstances proportionate and not unacceptable.

Marlyn Lodge

372. This is a mixed use property including residential units and it is to the south-east of the proposal site.
373. The submitted daylight and sunlight report has analysed 111 windows on the west façade of this property that fronting the proposed development. Results suggest that all windows analysed would meet the vertical sky component guidelines. This is assessed as negligible.
374. Daylight distribution (no sky line) has been analysed for 59 rooms that have windows facing the proposal site. Results suggest that 46 of these would meet the daylight distribution guidelines. The other 13 rooms failing to meet the guidelines appear to be living/dining rooms with a single aspect and over 5m deep. The report indicates that actual layouts have been used for this building. In such cases, the BRE Report (third party review report) acknowledges that “a greater movement of the no sky line may be unavoidable.”.
375. Although some of the affected living/dining rooms in this property would experience relative reductions of up to 49% in the area able to receive direct skylight, compared to the 20% guideline, it is considered that the main factor in these reductions is existing room layouts rather than the size of the new obstruction. This is assessed as minor adverse.
376. Loss of sunlight to the windows of Marlyn Lodge facing the proposed development is assessed as negligible since all of these would meet the BRE guidelines.

Minorities London

377. This is a 16-storey multi-residential building that is currently under construction to the north-east of the proposal site.
378. The submitted daylight and sunlight report has analysed 149 windows lighting 97 rooms, at this property that may potentially be impacted by the proposed development. Actual room layouts appear to have been used in the analysis of daylight distribution.
379. Results suggest that 144 windows would meet the vertical sky component guidelines, whereas the other five failing to meet the guidelines would experience relative reductions in VSC values between 23% and 71%, compared to the 20% guideline, with retained VSC values as low as 0.8%. However, absolute reductions in VSC values for the affected windows are between 0.7% and 2.5%, which are not substantial and indicate that these windows already receive low levels of daylight as quantified by the vertical sky component. One of the affected rooms is a bedroom whilst the others are living/dining rooms, and all but one appear to have at least one other window meeting the VSC guidelines. Overall, the loss of daylight to Minories London is assessed as minor adverse in terms of VSC because only a small number of windows would be impacted by the proposed development.
380. All rooms analysed would meet the daylight distribution (no sky line) guidelines. This is a negligible impact.
381. Out of all windows analysed, 144 would meet the loss of sunlight guidelines. One of the other five would still be able to meet the annual sunlight guideline but not the winter one. Overall, the loss of sunlight to Minories London is assessed as minor adverse because only a small number of windows would be impacted by the proposed development.

Fenchurch House, 136-138 Minories

382. This is a 6-storey mixed-use property to the west of the proposal site.
383. 19 windows, lighting 15 rooms, have been analysed at this property facing the proposed development.
384. Results suggest that only one window would meet the vertical sky component guidelines, whereas the other 18 failing to meet the guidelines would experience relative reductions in VSC values between 21% and 34%, compared to the 20% guideline, with retained VSC values between 11.4% and 18.8%. Absolute reductions in VSC values are between 2.8% and 8.4%. 12 out of the 18 windows failing to meet the VSC guidelines would experience a relative reduction between 21% and 29%. The VSC

results indicate minor to moderate adverse impacts on daylight to this property.

385. 13 rooms analysed would meet the daylight distribution guidelines. For the other two failing to meet the guidelines, the percentage area able to receive direct skylight would be reduced to 46% and 48%, corresponding to relative reductions of 52% and 47%, respectively, compared to the 20% guideline. This is assessed as minor adverse. Although the daylight distribution analysis is based on assumed layouts, the plans approved for the residential development at Fenchurch House, show that the rooms that are mainly affected are bedrooms than living rooms and therefore, in accordance with the BRE guidance they need less light than living rooms. It is therefore considered that, taking into account the built environment and context of the City and the fact that the impact on the flats when considered as a whole would not be detrimental, the daylight levels to the residential units would be acceptable. .
386. Loss of sunlight to Fenchurch House is not relevant since all windows facing the proposed development do not face within 90° of due south.

140 Minorities

387. This is a 6-storey mixed-use property to the west of the proposal site, which includes residential units.
388. The submitted daylight and sunlight report has analysed 32 windows, lighting 20 rooms, at this property facing the proposed development. Assumed room layouts appear to have been used in the analysis of daylight distribution.
389. Results suggest that 25 windows would meet the vertical sky component guidelines, whereas the other seven failing to meet the guidelines would experience very marginal relative reductions in VSC values of up to 21%, compared to the 20% guideline, with retained VSC values between 14.6% and 20.3%. Absolute reductions in VSC values are between 3.7% and 5.5%. This is assessed as minor adverse.
390. All rooms analysed would meet the no sky line guidelines, hence there would be negligible impacts on daylight distribution to this property. Although the daylight distribution analysis is based on assumed layouts and the results carry uncertainty and the actual impacts may be different in the existing rooms, it is considered that the impact would be acceptable given that the impact is minor adverse.
391. Loss of sunlight to 140 Minorities is not relevant since all windows facing the proposed development do not face within 90° of due south.

St John's House, 124 – 127 Minories

392. This is a 6-storey mixed-use property to the west of the proposal site, which accommodates residential units.
393. The submitted daylight and sunlight report has analysed 56 windows at this property facing the proposed development, lighting 28 rooms. Assumed room layouts appear to have been used in the analysis of daylight distribution.
394. Results suggest that 47 windows would meet the vertical sky component guidelines, whereas the other nine failing to meet the guidelines would experience marginal relative reductions in VSC values of up to 23%, compared to the 20% guideline, with retained VSC values between 10.6% and 19.6%. Absolute reductions in VSC values are between 3.1% and 5.5%. This is assessed as minor adverse.
395. 26 rooms analysed would meet the daylight distribution guidelines. For the other two failing to meet the guidelines, the percentage area able to receive direct skylight would be reduced to 37% and 44%, respectively, corresponding to relative reductions of 43% and 41%, respectively, compared to the 20% guideline. Although the daylight distribution analysis is based on assumed layouts and the results carry uncertainty and the actual impacts may be different in the existing rooms, it is considered that the impact would be acceptable given that the impact is minor adverse.
396. Overall, based on the results in the Point 2 report, the loss of daylight to St John's House is assessed as minor adverse both in terms of VSC and daylight distribution. This is because a low proportion of windows and rooms would be affected.
397. Loss of sunlight to St John's House is not relevant since all windows facing the proposed development do not face within 90° of due south.

Guinness Court

398. This is an 8-storey block of flats to the east of the application site.
399. 183 windows have been analysed at this property facing the proposed development, lighting 172 rooms. Assumed room layouts appear to have been used in the analysis of daylight distribution.
400. Results suggest that 170 windows would meet the vertical sky component guidelines, whereas the other 13 failing to meet the guidelines would

experience relative reductions in VSC values between 22% and 39%, compared to the 20% guideline, with retained VSC values between 2% and 7.6%. However, absolute reductions in VSC values for the affected windows are between 0.9% and 2.5%, which are not substantial and indicate that these windows already receive low levels of daylight as quantified by the vertical sky component.

401. The 13 affected windows appear to have overhangs above them and submitted daylight and sunlight report provides results for a no-balcony assessment in which the overhangs above these windows have been removed. This is in line with the specific guidance in the BRE Guidelines given for such situations to assess whether it is the presence of existing balconies or overhangs or the presence of the proposed development that causes the impact. No-balconies results indicate that all these affected windows would meet the VSC guidelines without the overhangs in place, and therefore this is the main factor causing the impact on daylight to these windows rather than the proposed development. Moreover, all these windows appear to serve entrance or circulation areas in the building, in which case loss of daylight is not relevant as these are not habitable rooms.
402. Out of all 172 rooms analysed, 160 would meet the daylight distribution guidelines. For the other 12 failing to meet the guidelines, the percentage area able to receive direct skylight would be reduced to as low as 28%, corresponding to relative reductions of up to 57%, compared to the 20% guideline. Although the daylight distribution analysis is based on assumed layouts and the results carry uncertainty and the actual impacts may be different in the existing rooms, it is considered that the impact would be acceptable.
403. Overall, based on the results in the submitted report, the loss of daylight to Guinness Court is assessed as minor adverse both in terms of VSC and daylight distribution. This is because a low proportion of windows and rooms would be affected, and it appears that the main factor causing the impact would be the presence of balconies or overhangs rather than the proposed development.
404. As regards loss of sunlight, results suggest that out of the 183 windows analysed 177 would meet the guidelines. Two of the six windows failing to meet the guidelines appear to serve entrance or circulation areas hence are not relevant as they do not light habitable rooms. The other four appear to be to habitable rooms on the first and second floors, yet it is uncertain whether the rooms they light are living rooms, kitchens, or bedrooms. However, although all other four windows would not meet the winter guideline, two of them would meet the annual sunlight guideline and the other would be marginally below the annual sunlight guideline. Overall,

the loss of sunlight to Guinness Court is assessed as minor adverse since a low proportion of windows would be affected.

Conclusion

405. For daylight, Fenchurch House (136-138 Minories) would experience Minor to Moderate Adverse effects, whilst the flats at 27 Minories would experience Major Adverse effects.
406. For sunlight, Minories London and Guinness Court would experience Minor Adverse effects.
407. The VSC results of the 'mirror-image building' methodology indicate major adverse impacts on the windows on the east elevation of 27 Minories. As noted above, these windows serve bedrooms and a kitchen/diner. Given that bedrooms, by reason of their nature and in accordance with the BRE guidance, do not need as much daylight as living rooms, and considering their position, relationship with the application site, orientation and dense nature of development in the City, it is considered that, in these circumstances, the impact would not be detrimental to extent that would warrant refusal of the application on those grounds. The impact on the fifth floor windows would be less harmful, given that the rooms containing the windows on the affected east elevation are also served by windows on the north elevation. It is therefore considered that the impact would not be in these circumstances unacceptable.
408. Overall the daylight and sunlight available will be sufficient and appropriate to the context, and acceptable living standards would be maintained. As such, the overall impact (including the degree and extent of harm) is not considered to be such that it would conflict with, London Plan policy D6, Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

Sunlight to Amenity Spaces

409. The potential impacts of the Proposed Development on the sunlight availability on surrounding amenity areas has been assessed. A third party review on the findings of the daylight, sunlight and overshadowing report has also been carried out.
410. The nearest open space to the application site is the communal outdoor area of Mansell Street Estate and the residential rear gardens at Iveagh Court to the east of the application site. No other gardens or open spaces have been identified in the vicinity of the site, which would potentially be impacted by the proposed development.
411. Although the 'before' development value is not included in the submitted daylight and sunlight report and the change in sunlight hours cannot be

verified, the 'after' development result is sufficient in this case because 76% of the area of this open space would continue to receive at least two hours of sunlight on 21 March. This is more than half of the area and therefore the BRE guideline is met and there would be negligible impacts on sunlight to this open space as a whole area.

412. The rear gardens at Iveagh Court have been included in the overall outdoor communal area discussed above. However, they appear to be private and therefore separate from the entire open space. Based on the map in Appendix 3 of the submitted report, these spaces are estimated to already receive less than two hours of sunlight over half of their area on 21 March in the existing context because they are already heavily shadowed by Iveagh Court itself, which lies immediately to the south. Impacts on sunlight to these spaces from the proposed development are still anticipated to be negligible given the geometry and orientation of the proposed development in this site context.
413. It is therefore considered that the overall effect of the proposed development on the sunlight availability to Mansell Street Estate and the residential rear gardens at Iveagh Court would be negligible.

Solar Glare

414. Policy D8 of the London Plan, Local Plan policy DM10.1 and draft City Plan 2036 policy DE8 require development to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.
415. Although no report has been submitted regarding solar glare and convergence, and the amount of glazing in the proposed building is increased from the existing, it is considered that due to the design of the building, with vertical than sloped, convex or concave facades, the impacts from solar glare or convergence would be limited. Furthermore, the facades of the building are not made of primarily large areas of reflective glass. The elevational design of the building is such that there is a balance between the glazed and bricked elements.
416. For the aforementioned reasons., it is considered that the no further assessment of the solar glare impacts of the development is required, as these are expected to be minimal.

Overlooking, Privacy, Outlook and Overbearing Impact

417. Policy DM 21.3 of the Local Plan requires all development to be designed to avoid overlooking and seek to protect the privacy to adjacent residential occupiers. The same is reiterated in Policy HS3 of the draft City Plan.
418. The site is located in close proximity to residential units. The easternmost bedroom windows of the flats at 27 Minories are located approximately 8 metres away from the proposed development and the windows of the northwest element of the new development. This section of the development has been designed so that it is in a slight angle in relation the east elevation of 27 Minories. However, it is considered that the windows on this elevation would directly overlook onto the nearby residential units. It is therefore considered reasonable that a condition is imposed for those windows to be glazed in obscure glass to avoid direct overlooking.
419. The properties to the north and east are located a further distance away from the proposed development and due to the orientation and interrelationship of the fenestration of the development with these adjacent residential units, it is not considered that the development would result in unacceptable levels of overlooking.
420. Mansell Street Estate is located to the east of the application site. Although the majority of the residential units are located a significant distance away from the application site. Iveagh Court is located close to the boundary of the application site and it comprises units with private outdoor amenity space to the north. The redeveloped building would be located approximately 18 metres away from Iveagh Court and private amenity spaces. To protect from overlooking and loss of privacy, the balconies proposed to the rear elevation would not be accessible from the occupiers of the building, except for maintenance. Furthermore, the rear elevation of the southeastern section of the building, closer to Iveagh Court, is angled to reduce direct overlooking. No windows are proposed to be installed on the east elevation of Writers House and therefore, no objection is raised in that respect.
421. 128 - 129 Minories is located directly to the west of the proposed development. It is noted that the existing building benefits from windows on the west elevation and the proposed building would not result in a greater impact than that already caused in terms of overlooking. The balconies to the front elevation would not be positioned directly opposite the nearby residential units and therefore, it is not considered that this element of the scheme would result in material harm in terms of overlooking.
422. The rest of the nearby residential properties are located further distance away from the application site and in a position where no further impact, in terms of overlooking or loss of privacy, is expected to be caused.

423. For the aforementioned reasons, it is considered that subject to the imposition of a condition regarding installation of obscured glazed windows to some windows to avoid direct overlooking on the properties at 27 Minorities, the development would have an acceptable impact, in terms of overlooking and privacy.
424. As noted above, the proposed development would be located approximately 8 metres away from 27 Minorities and therefore, it would reduce the existing outlook from the windows on the east elevation. By reason of the scale and height of the development, the proposal would also appear somewhat overbearing. However, taking into consideration the position of those windows in very close proximity to the boundary with an existing developed site and also taking into account the fact that these windows serve secondary bedrooms and the rest of the flats are served by windows on other aspects that would not be affected by the proposed development, it is considered that the impact on the living conditions of the occupiers of these properties would be limited and not such that to warrant refusal of the application on those grounds.
425. By reason of the distance maintained between the proposed development and the rest of the nearby properties, it is not considered that the development would result in a greater overbearing impact or unacceptable level of loss of outlook to nearby residential properties.

Thermal Comfort Assessment

426. London Plan Policy D8 and D9 and the emerging City Plan 2036 Policy S8 indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
427. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. The technique

involves merging the effects of wind, air temperature, humidity and solar radiation data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.

428. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location:

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

429. Three configurations have been assessed including the following.

- Configuration 1: existing site with existing surroundings (surrounding street level);
- Configuration 2: proposed development with existing surrounding (surrounding street level, proposed roof terraces and balconies);
- Configuration 3: proposed development with consented (future) schemes in the surrounding (surrounding street level, proposed roof terraces and balconies)

Street Level

430. The existing surroundings (Configuration 1) to the site experience comfortable conditions for at least 90% of the duration of all seasons. When both Configurations 2 and 3 are considered the resulting year-round comfort grade is 'All Seasons', which is appropriate for year-round amenity use. Overall, the proposed development is predicted to have a negligible impact on the surrounding area.

Proposed roof terraces

431. For the larger terraces on the upper levels of the proposed development in both Configurations 2 and 3, the thermal conditions are comfortable for at least to 90% of spring to autumn seasons. Adverse wind conditions in the winter significantly reduce the comfort to at least 81%. The predicted year-round grading comfort is 'Seasonal'.
432. For the lower level (smaller) terraces of the proposed development in both Configurations 2 and 3, they largely experience comfortable conditions for at least 90% of the duration of all seasons. The predicted year-round comfort grade is 'All-season'.

Proposed Balconies

433. For all balconies on the proposed development in both Configurations 2 and 3, the thermal conditions are comfortable for at least 90% for all seasons. The predicted year-round comfort grade is 'All-season', suitable for year-round amenity use.

Thermal Comfort Conclusion

434. The simulations indicate that thermal comfort conditions are suitable for their intended uses.
435. It is considered that the thermal comfort in and around the site, would be acceptable in accordance with London Plan Policy D8 and Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Light Pollution

436. Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
437. The Lighting SPD 2023, requires that a Lighting Strategy and Lighting Concept are submitted at application stage. It is noted that this application was submitted prior to the adoption of the Lighting SPD and therefore, these documents do not accompany the application. To ensure that appropriate lighting levels are achieved externally and internally and to mitigate impacts of public realm and nearby residential properties, it is considered pertinent that a condition for the submission of relevant details of a Lighting Strategy and Lighting Concept are submitted for approval. This will have to be submitted prior to the occupation of the building and

the details shall accord with the requirements as set out in the Lighting SPD, including but not limiting to details of all external lighting (street, amenity lighting illuminated advertisement ect) and internal lighting visible from the public realm or which could impact to residential amenity and the environment.

Air quality

438. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.
439. The Air Quality Assessment includes an assessment to the likely impact of the proposed development on air quality as a result of the demolition, construction and the operational phases of the proposed development. It is noted that the development in compliance with the London Plan's requirements would be air quality neutral in terms of both building and transport related emissions. The development would be car-free with the exception of a blue badge parking space, which will be secured by condition. Furthermore, the submission Air Quality Assessment confirms that the development would not include any centralised combustion plant or gas boiler. It will only have life safety diesel generator and diesel pump for commercial sprinkler system.
440. During demolition and construction dust emissions would increase and require control through the implements of good practice mitigation measures contained in the Scheme for Protecting Nearby Residents and Commercial Occupiers to be submitted and approved under conditions proposed to be attached to the planning permission.
441. The City's Air Quality Officer has raised no objection subject to conditions in respect of an Air Quality Neutral Assessment, generators, combustion flues, and Non-Road Mobile Machinery Register.
442. In light of the above and subject to conditions, the proposed development would accord with Local plan policy CS15, policies HL2 and DE1 of the draft City Plan 2036 and SI 1 of the London Plan which all seek to improve air quality.

Noise and Vibration

443. Local Plan 2015 policy DM15.7, and London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.
444. An Acoustic Assessment has been submitted which provides an outline assessment of the impact of noise and vibration from the mechanical plant on the surrounding area. The assessment also includes an assessment of breakout noise from the proposed uses.
445. The proposed development includes a main plantroom at the two basement levels, in addition to on-floor air handling units and roof top plant. To ensure that noise from plant is adequately controlled and minimised, conditions are recommended relating to plant noise and vibration.
446. The assessment states that activity noise break-out will need to be controlled. To ensure that the noise impacts from the proposed development are adequately controlled and minimised conditions are recommended relating to live and recorded music; hours of use, the closing of windows and doors to any bar or restaurant; the party wall between office and non-office elements.
447. Generally, in City redevelopment schemes, most noise and vibration issues occur during demolition and early construction phases. Noise and vibration mitigation, including control over working hours, types of equipment used, would be included in Schemes of protective works for Demolition and Construction Logistics Plan to be approved by condition. Concerns have been raised from the nearby residents regarding noise and dust during construction. To ensure that the residential amenity of the neighbouring occupiers is preserved, it is considered reasonable that the following measures are in place during demolition and construction:
- Noise mitigation measures in the periphery of the site. This can constitute an acoustic insulation sheeting.
 - Provision of an amenity (respite) space for the residents of the Mansell Street Guinness residential Estate.
448. The Transport Assessment sets out that the delivery and servicing (including refuse vehicles) for the site will take place in a designated integral servicing point at ground level at the northern edge of the site, with direct access from St Clare Street. It is noted that this is the location of the existing on-site car parking associated with 30 Minorities. It is noted that restricted hours for deliveries and servicing will be secured by condition.

449. Subject to the proposed conditions, the proposals would comply with London Plan Policy D13 and D14, Local Plan Policy DM15.7 and draft City Plan 2036 Policy HL3.

Health Impact Assessment

450. Policy HL9 of the draft City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.
451. Policy GG3 of the London Plan states that *“To improve Londoners’ health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments”*.
452. The applicants have submitted a Health Impact Assessment (HIA) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health effects.
453. The submitted HIA has identified information relating to the following eight key determinants of health:
- Access to Open Space and Nature;
 - Air Quality, Noise and Neighbourhood Amenity;
 - Accessibility and Active Travel;
 - Crime Reduction and Community Safety;
 - Access to Healthy Food;
 - Access to Work and Training;
 - Minimising the Use of Resources; and
 - Climate Change.
454. The HIA has been assessed using the Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Matrix. Impacts on the future Site users of the Proposed Development and on the local community, have been identified and are detailed in the Assessment Matrix. The Assessment concludes that there would be no adverse health effects and that the development would have an overall positive impact on health. Positive impacts include:

- Provision of a car free development, with excellent transport links, promoting sustainable forms of transport. This will promote more active lifestyle.
- Provision of cycle parking spaces with end of trip facilities. This will encourage healthy modes of transport and an active lifestyle, which in turn leads to physical and mental health and wellbeing.
- Creation of a high quality and active frontage that complements the existing context and improves the streetscape. This creates passive surveillance, thus improving safety within the area, which is positive in reducing stress and creating a sense of security.
- Use of PVs, air source and water source heat-pumps for providing hot water and space heating. This eliminating the need for the use of fossil-fuels and emission-releasing sources on Site for heat and power production. The Proposed Development will also be air quality neutral.
- Provision of new public realm at ground level and private amenity space for the commercial office space. This will assist with physical activity and provide a space for people to meet and socialise. This in turn will provide physical health and overall wellbeing through improved social cohesion. Further to this, the Proposed Development is targeting WELL Platinum standard, to design the building to the highest quality, in order to benefit the future occupiers of the Site.
- Provision of new jobs associated with construction and operation phases. Provision of employment offers benefits from a health perspective, including the ability to buy goods, it fosters social relationships with colleagues and has a positive impact on ones sense of self and result in improved wellbeing.
- Provision of ecological benefits and enhancements through biodiversity green roofs and planting on terraces and balconies.

455. It is considered that any potential negative impacts would need to be mitigated during the demolition, construction and operational phases, for example by employment of a scheme for protecting nearby residents from noise, dust and other environmental effects to mitigate dust emissions and address any adverse amenity impacts arising from demolition and construction. The provision of an acoustic insulation sheeting will also be secured by condition. It is also noted that an amenity space for the residents of the Mansell Street Guinness residential estate will be secured through the S106 Agreement, to ensure that a suitable space is provided for the nearby residents during demolition and construction works. It is therefore considered that the impacts would be mitigated so far as possible by the requirements of relevant conditions and S106 obligations.

456. Overall, it is considered that the development seeks to improve the health and addresses health inequalities. The residual impact would be acceptable, and the proposals would comply with London Plan policy GG3 and draft City Plan 2036 policy S1.

Sustainability

Circular Economy

457. 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.
458. The application includes considerations as to whether there is an opportunity to retain and refurbish building or building elements currently on site.
459. St Clare House, completed in 1958, is a T-shaped office block comprising a five-storey 'podium' with shops and restaurant at ground level fronting Minorities with a 13-storey element at the rear. The building was comprehensively refurbished in 2000 and the tall element re-clad in grey and white panels.
460. On-site visual inspection assessed the frame to be in-situ reinforced concrete, with external load bearing masonry facades to the podium. Windows are single glazed with Crittall frames. The tower is clad in a lightweight metal curtain walling system. The majority of material at basement and ground floor level has not been updated for at least 30 years and appears to be of poor quality. Existing masonry frontages appear poorly insulated with significant overhaul likely required to achieve operational efficiencies.
461. Existing floor plates are narrow, with insufficient vertical transportation means and service risers for the mixed-use proposed and to meet current occupier expectations. The structure would need significant changes to modernise circulation whilst additional basement space would be required to provide optimal new MEP systems and end of trip cycle facilities. A basement of this size would likely require clearing the site to enable works.
462. A Carbon Options appraisal was undertaken in line with the CoL's Carbon Options Guidance which assessed three development strategies. All assessment options retain Writers' House which would be subject to limited demolition and refurbishment only.
- **Assessment 1: Light refurbishment** – minor interventions, updates to internal spaces as a refit, no structural / façade / MEP amendments, current energy performance based on available data for existing building, 100% of substructure and 95% of superstructure retained by mass

- **Assessment 2: Major refurbishment** – Demolition of the Clare House tower, retention of the structural frame only of the five-storey ‘podium’ building running along Minories, , full façade replacement to achieve operational efficiencies. 216% increase in GIA, 90% of substructure and 30% of superstructure retained by mass
 - **Assessment 3: Full demolition and redevelopment** (with the exception of Writers’ House), offering a 232% increase in GIA, 0% retention.
463. Other options with different scopes of retention were considered and discounted at pre-application stage for reasons such as limitations on potential area uplift, value for investment, complexity of intervention works, diminished operational performance, flexibility, or overall quality achievable for the lettable space.
464. The applicant notes that whilst retention of the podium building would result in lower upfront carbon, it would also impose constraints on the development specification of the rest of the site. Reduced storey heights and pre-determined structural fabric would affect operational performance and overall quality of space provided.
465. The Carbon Option appraisal was subject to review by a third-party expert. The reviewer has confirmed that the optioneering has been carried out in compliance with the CoL’s Carbon Options Guidance, 2023.

The application proposal

466. The Circular Economy Statement (CES) submitted describes the strategic approach to the incorporation of circularity principles and actions according to the GLA Circular Economy Guidance. The applicant team have looked to:
- Minimise the quantities of materials used through material efficiency, careful material specification and use of prefabrication where appropriate. 2 out of 3 BREEAM credits targeted for Wst 01 construction resource efficiency
 - Minimise quantities of other resources used - 3 BREEAM Water credits targeted
 - Specify and source materials responsibly and sustainably
 - A project Sustainable Procurement Plan (SPP) will be established and include measures to influence sustainable procurement of key material groups, including concrete, steelwork, and aluminium
 - Seek out Responsible Sourcing Certification Schemes
 - Target a minimum of 20% of the total value of materials to derive from recycled and reused content in line with GLA Circular Economy Guidance

- Design out waste - Resource Management Plans (RMP) will be required for both construction waste, and demolition waste.
 - A municipal waste strategy is proposed.
467. A pre-demolition audit and reuse assessment were undertaken to assess opportunities for reclamation and reuse, estimate quantities of materials and advise on efficient deconstruction methodology.
468. The pre-demolition audit identified a significant number of architectural fixtures and fittings, plant, and appliances, which could be salvaged and reused. Advice was included on which items to prioritise in terms of carbon value, along with a list of suitable marketplaces/merchants. If undertaken, it is estimated this salvage process could reduce the overall waste figure by 37%.
469. Overall reuse potential is presented as follows:
- Furnishings: 80%
 - Structural elements: >2%
 - Plant/appliances: 80%
470. The development aspires to achieve at least 20% of recycled content of the overall materials procured.
471. The development has been designed to eliminate waste and facilitate ease of maintenance including accommodating for changes in use and internal layout as well as future replacement of the main plant. MEP installations are designed to serve the building on a floor-by-floor basis with capped and metered services at each floor riser, meaning future tenants can extend / modify the services to suit their particular needs.
472. The facade will be mainly built of large UHPC (ultra high-performance concrete) panels with bonded brick slips. Use of UHPC on the façade instead of traditional precast will minimise the use of material and result in a lighter-weight façade, lower embodied carbon, and better durability. Most of the manufacture and assembly will be done off site in a controlled factory, improving quality and reliability, and reducing material waste. The façade can be deconstructed by reversing the construction sequence, enabling large assemblies to be transported back to a factory for disassembly and preparation for reuse or recycling.
473. An update to the detailed Circular Economy Statement including results from the detailed design phase and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved are required by conditions.

Operational energy strategy and carbon emissions

474. The application proposal has been designed to achieve an overall 18% reduction in regulated carbon emissions compared to Building Regulations Part L 2021 compliant building.

Be Lean

475. The proposed energy demand reduction strategy would reduce the building's operational emissions by 13%.

476. Energy demand and the risk of overheating would be reduced by including the following design measures:

- "Fabric First approach" – high thermal performing building envelope, with optimised façade design which balances solar control, daylighting, and occupant view-out, informed by early-stage detailed modelling analysis
- Heat recovery
- Promoting energy savings and wellness initiatives through robust metering, and control strategy
- Integration of openable elements in the façade to provide fresh air for occupants and to reduce reliance on cooling during summer months.
- Energy-efficient equipment specified throughout, including MEP and low energy lighting
- Ambitious energy use intensity target (EUI) for operational energy
- Low flow water outlets / appliances and water reuse technologies
- Digital Building Management System (BMS) to enabling monitoring and control of building systems to optimise efficiency.

477. Extensive façade modelling resulted in the adoption of the following design strategies:

- Reduced glazing ratios for all typical office floors
- Inclusion of passive shading through use of architectural features (deep window reveals and horizontal/vertical façade elements) and planting
- Low solar transmittance glazing to mitigate excess solar gains and overheating
- Targeting compliance with British Council for Offices (BCO) guidance meaning limiting perimeter zone solar gains to <40-45 W/m² passively without compromising daylighting.
- Efficient u-values as a vital measure for reducing carbon emissions. All proposed u-values achieve notable improvement over Building Regulations Part L2A.

478. Increased clear-ceiling-height of the proposal compared to existing (2.9m from 2.4m) allows greater engineering flexibility and improved energy efficiency for ventilation (enhanced fresh air volumes, ability to incorporate natural ventilation).

Be Clean

479. There is no planned heat network infrastructure in the area at present. A space for a connection to a future heat network has been allocated in the proposed basement 1. The heating / cooling systems proposed are compatible for future heat network connection.

Be Green

480. The proposal is for an all-electric energy strategy (except for emergency generators) primarily served by centralised low-temperature hot water (LTHW) plant incorporating air source heat pumps.
481. An interlinked thermal system will control and utilise excess heat effectively, reducing energy use and the impacts on the local urban heat island. Thermal stores will be used to balance peak loads of domestic hot water use. The proposal also includes 37 PV panels installed on the roof to serve landlord energy supply. Overall, the renewable and low carbon technologies account for over 4% of the carbon emissions savings.

Energy use intensity

482. 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 offices, 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 92.8 kWh/m²/year and for the space heating demand 5.55 kWh/m²/year. The energy statement notes that these are “conservative estimates at this stage, and the energy consumption is anticipated to decrease with further design and modelling detail and again at operation stage in collaboration with tenants, monitoring, and optimisation”.
483. The site-wide energy strategy as proposed does not meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme, however, the GLA acknowledges in a note released in 2022 that “Initially, non-residential developments may find it more challenging to achieve significant onsite carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35%

improvement. This is because the new Part L baseline now includes low carbon heating for non-residential developments but not for residential developments.”

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

BREEAM

485. A BREEAM New Construction 2018 (shell & core) pre-assessment has been prepared, with a target score of 79.51% achieving an “excellent” rating. The development has the ambition to achieve ‘outstanding’ (>85%) with the pre-assessment indicating a potential achievable score of 86.99%. The pre-assessment is 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 resilience credit in the Waste category.
486. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2040 Policy DE1. Post construction BREEAM assessments are requested by condition.

Whole life-cycle carbon emissions

487. 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 (WLCA) 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 accounts for 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, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the development.
488. A carbon options appraisal has been undertaken in line with the CoL Carbon Options Guidance, 2023. Three options were assessed:

- **Assessment 1:** Light refurbishment – minor internal alterations only, a baseline highlighting the current energy performance of the existing building, 100% retention of substructure and 95% retention of superstructure by mass
- **Assessment 2:** Major refurbishment – Retention of the structural frame of the five storey ‘podium’ building only, amounting to 90% of substructure and 30% of superstructure retained by mass
- **Assessment 3:** Full demolition and redevelopment (with the exception of Writers’ House), 0% retention.

489. The appraisal of the three scenarios for the site (as set out in the Circular Economy chapter) has been underpinned by a quantitative assessment of whole life-cycle carbon emissions of each option. As expected, the light refurbishment option results in the lowest carbon intensity per square meter while the full redevelopment generates the highest. Retention of the superstructure and substructure of the podium building is estimated to save around 25% of upfront emissions associated with construction compared to that of a replacement building.

490. The project team have identified measures to reduce embodied carbon emissions for Assessment 2 and 3:

- Reduced carbon concrete in reinforced slabs and columns (using 50% cement replacement).
- Reduced carbon concrete in post-tensioned slabs (using 30% cement replacement).
- Hydroelectrically-sourced aluminium in the facades.
- Recycled raised access flooring panels.
- Contractual target for the main contractor to achieve a 50% reduction in site emissions compared to the RICS baseline.

491. Quantitative results from the options appraisal are set out in the table below:

	Assessment 1 Minor refurbishment	Assessment 2 Major refurbishment with extension	Assessment 3 Redevelopment
Gross Internal area (GIA) m ²	15,289	24,862	26,647
Net Internal area (NIA) m ²	Not provided	Not provided	Not provided
Change in NIA (compared to existing) m ²	NIA not calculated	6,560	7,938
Substructure % retained by mass	100	90	0
Superstructure % retained by mass (frame, upper floors, roof, stairs, ramps)	95	30	0
Upfront Embodied Carbon (A1-A5) (kgCO ₂ e/m ² GIA) <i>excl. sequestration</i>	351	563	778
In-use & End of Life Embodied Carbon (B-C) (kgCO ₂ e/m ² GIA) <i>excl. B6 & B7</i>	454	386	504
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO ₂ e/m ² GIA)	805	949	1,282
Fuel source	Electricity	Electricity	Electricity
Estimated Base Build* Operational Energy (EUI) (kWh/m ² /yr GIA)	88	38	40.6
Estimated Whole Building Operational Energy (EUI) (kWh/m ² /yr GIA)	172	85.4	92.8
Estimated Base Build* Operational Carbon for building lifetime (B6) (kgCO ₂ e/m ² GIA)	189	81.3	86.9
EPC rating	Minimum B	Not modelled, suggested: A	A (anticipated)
Total WLC Intensity (incl. B6 & pre-demolition) (kgCO ₂ e/m ² GIA) <i>Module B7 is not considered</i>	994	1,030	1,369
Upfront Embodied carbon (A1-A5) (tCO ₂ e)	5,366	13,997	20,731
In-use embodied carbon (B-C) (tCO ₂ e)	6,941	9,597	13,430
Operational Carbon for building lifetime (B6) (tCO ₂ e)	2,890	2,020	2,313
Total WLC (incl. B6 and pre-demolition) (tCO ₂ e) <i>Module B7 is not considered</i>	15,198	25,614	36,475

*base build (landlord supply) refers to a broader range of energy sources than Part L 'unregulated' energy and excludes tenant energy use

492. Due to the significant level of intervention required for Assessment 2, including complete replacement of facades, finishes, and building services, as well as a significant quantum of removal and rearrangement of existing structural elements, this option would still result in approximately three

quarters of embodied carbon emissions per square meter, compared to the redevelopment option Assessment 3. In absolute terms, Assessment 3 would result in approximately 30% higher whole life-cycle carbon emissions compared to Assessment 2, due to the higher whole life-cycle carbon emissions per square meter and the greater quantum of proposed floorspace.

493. However, the redevelopment option would have the opportunity for greater floor to ceiling heights and an optimised structural grid layout throughout the whole development which would provide greater spatial and operational efficiency and offer higher quality and more flexible, grade A commercial office space. The redevelopment would also be able to offer additional, wider environmental benefits including significant uplift in greening and biodiversity, end of trip facilities supporting active travel, and greater climate resilience including reduced risk of overheating and flood risk, and therefore is considered to be the preferred long term option.

The application proposal

494. The Energy and Sustainability Statement sets out measures the applicant team will use to minimise embodied carbon including:
- Use of complex software and parametric analysis techniques to produce efficient structural geometry and design
 - Optimisation of structural layout to minimise transfers and simplify load-paths
 - Employing smaller structural grids where possible
 - Carrying out structural option studies, with holistic evaluation from the wider design team
 - Use of Ultra High Performance Concrete (UHPC) on the façade instead of traditional precast to minimise the use of material and result in a lighter-weight façade, with lower embodied carbon associated with reducing overall structural loads, material efficiency and reduced transportation impact
 - Use of standard ranges and dimensions of major MEP plant items and installations throughout to minimise additional manufacturing waste
 - Cat A fit-out to one floor only to demonstrate build quality and spatial coordination with other floors left as shell for the future tenants to fit out to their needs.
495. Operational energy can be driven down by a combination of measures:
- Extensive façade performance optimisation to minimise solar gains
 - A distributed air system with on-floor air-handling units (AHUs) and displacement ventilation (localised system using outdoor air) which significantly improves efficiency and control of energy use

- 100% electric HVAC facilitating long term decarbonisation as the grid decarbonises.

496. The table below shows how the application proposal compares to GLA benchmarks for embodied carbon emissions. The applicant team is targeting the GLA aspirational benchmarks.

Scope	Proposed Redevelopment	Benchmark	GLA Benchmark
RICS Components	kgCO2e/m2	kgCO2e/m2	
A1-A5	773	< 950	Standard
		< 600	Aspirational
A-C (excluding B6)	1,282	<1400	Standard
		< 970	Aspirational
B6/B7 (only landlord areas - base build)	758		
A-C (including B6)	2,043		

497. Embodied carbon accounts for 34,151 tCO2e or 63% of total whole life-cycle carbon emissions, and the operational emissions are 20,186 tCO2e or 37%. Building services make up a significant proportion of the embodied carbon impact in the A-C modules, contributing 28.4% exacerbated by the fact that they have replacement cycles significantly shorter than the 60-year assessment period. The superstructure has with 22.5% the second highest proportion of embodied carbon impact. The overall A-C value is ca 9% lower than the GLA's standard benchmark for commercial office developments. The application stage WLC calculations for the development proposal are based on planning stage level detail and significant reductions can be anticipated during the latter stages of RIBA 3 and during final specification and procurement.

498. A detailed Whole Life-Cycle Carbon assessment incorporating improvements that can be achieved through the detailed design stage, and a confirmation of the post-construction results are required by conditions.

Urban Greening and Biodiversity

499. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, DM 10.2 (Design of green roofs and walls) and 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces.

500. A separate landscape design strategy was submitted with the application. The development proposal achieves an urban greening factor (UGF) score of 0.3 / 0.34 (using the London Plan and CoL factors respectively), 8.5 times more than the existing condition.

501. The proposal uses the City of London Biodiversity Action Plan 2021-2026 to benchmark the soft landscape and biodiverse enhancements. The development proposal includes planters and trees at street level, including a publicly accessible planted courtyard, planted terraces and balconies and green roofs, with species selected to meet climatic conditions of each area. To accommodate the higher landscaping loads on the terraces, the floor slabs of the terraces have been strengthened. The proposal observes its role in creating urban green corridors and planting typologies and habitat creation will be aimed at attracting the City’s target wildlife species.

Proposed Roofs	
Extensive Green Roof Area	308 m ²
Semi-Intensive Green Roof Area	149 m ²
Blue Roof Available Attenuation Volume	41.4 m ³
37 Photovoltaic Panels	8.64 MWh per annum 13.51 kWp peak output

502. The Proposed Development will have a habitat units value of 0.35 in comparison to the existing site which has a habitat units value of 0.02. The would result in a net biodiversity gain of 0.33 (over 1,645%).
503. Details of the quality and maintenance of the proposed urban greening and biodiversity are required by condition.

Climate Change Resilience

Water resources

504. The proposed development will target a minimum of 3no. Wat 01 credits which accounts for a 40% improvement on the baseline benchmark. Low-consumption components and sanitaryware will be specified in accordance with the EU water efficiency label. Water metering and leak detection systems will be installed and linked to the Building Management System. Automatic shut-off devices will ensure water is only supplied to spaces (such as WCs) when required.
505. A blue roof at level 12 would be supplemented with an attenuation tank using “Smart Tank” technology at basement level for rainwater harvesting to use for irrigation and toilet flushing. Greywater from showers would be recycled for the same purpose.

Flooding

506. The GLA’s London Plan 2021 Policy SI 12 gives specific guidance on the provision of flood resilience which is relevant to this development with

Policy SI 13 noting that developments should aim to achieve greenfield runoff rates and ensure run-off is managed as close to the source as possible.

507. A detailed Flood Risk Assessment and Drainage Strategy were included at application stage which include allowances for climate change. The site lies within Flood Zone 1 (low risk) and is expected to remain so for its operational lifetime (based on location and elevation). Surface water (pluvial) risk is very low risk.
508. The water management strategy follows the principles of the SuDS Management Train (sequential method for drainage measures) focussing on source and site controls in line with Policy SI 13 guidance. The proposed attenuation combines a rainwater-harvesting system, blue roof system at roof level and an attenuation tank in the basement (as back-up for when roof storage is at capacity).

Heat Stress

509. Policy SI 4 of The London Plan (2021) states that major development proposals should reduce potential overheating, and reliance on air-conditioning systems, and demonstrate this in accordance with its cooling hierarchy.
510. The glazing ratio and façade design including recessed openings and solar shading have been optimised to limit solar gains. Highly efficient mechanical ventilation with heat recovery is proposed which will provide fresh air supply all year round with floor to ceiling heights in office areas providing effective air flow. Office floors will also have operable window panels within the façade offering mixed-mode ventilation. This will also provide health and wellbeing benefits to the office occupants. It is noted that it would not be possible to achieve adequate levels of thermal comfort solely through natural ventilation due to the deep floor plan of the building.

Natural Capital and Pest & Diseases

511. The proposed development will incorporate urban greening that would significantly improve on the existing quantity and quality on site, in terms of public realm enhancement and biodiversity. The landscape proposal will help create urban green corridors and provide small habitats focussed on CoL priority species, to include nesting boxes and log piles. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient to hotter dryer summers, warmer wetter winter, more extreme weather events and pests and diseases.

512. Overall, this development includes a range of measures which will improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, with detailed modelling and planting plans required by conditions including comparison against the UK Climate Projections UKCP18 to 2080 (tools and data that show how the UK climate may change in the future, based on potential emissions scenarios).

Conclusion

513. 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 and reduction, 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.
514. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy work/life environment, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy overall meets, current and new London Plan policies as well as Local Plan policies. It is on track to achieve an “excellent” BREEAM assessment rating.
515. The design proposal has undertaken extensive modelling and analysis including of structural, façade and MEP systems to maximise material and operational efficiencies and drive down whole life-cycle carbon emissions. This process has resulted in a reduced carbon, circular façade system, optimised to reduce overheating, and the proposed development is on track to exceed the GLA’s Standard Benchmark for embodied carbon emissions. The existing building has been assessed and found to be unsuitable to meet expectations for an attractive and sustainable development.
516. Redevelopment offers the opportunity to implement highly efficient heating and cooling systems. The application proposal has been carefully designed to optimise efficiency utilising on-floor, localised building services and employing passive energy-saving measures to significantly reduce operational carbon emissions. Circular Economy principles can be positively applied, including to façade system and building services specifications, to achieve a long term, robust, low carbon, flexible and adaptable development. The building design responds well to climate

change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and generous opportunities for urban greening and biodiversity.

Security

517. The application is supported by a Security Needs Assessment which has been developed in consultation with the City Police Designing Out Crime and the Counter Terrorism Security officers to obtain information regarding crime and disorder issues in the immediate vicinity of the site. Through the assessment the specific risks to the proposal have been identified and security improvements have been recommended.
518. The crime statistical analysis identifies the location as a medium crime area. The site already offers excellent informal surveillance opportunities both to and from neighbouring properties and a high footfall/vehicular highway adds to passive surveillance prospects. The submitted assessment concludes that the proposed use of the site would provide a coherent, and continuous use of the space without significant change to the site functions, nor impacting on either resident/hotel guest or nearby businesses.
519. The doors used on site would be bi parting drum door. It is stated that whilst there currently are no accredited products on the market (due to curved glazing) the potential staffing numbers accessing the site on a daily basis requires a style of doors to support a substantial footfall at busy periods. Subject to sourcing the doors from the recognised supplier and subject to on site security inside the building, the proposed doors can be deemed appropriate to security.
520. Any openable window forming part of the commercial shell must, as a minimum requirement, comply with the PAS24 specification. This relates to any window less than 3.5m from ground level. If upper floor openable windows deemed 'easily accessible', similar requirements could apply.
521. Details of the glazing units, access control and core protection are yet to be finalised. Bin storage would be internal to the building. It is considered that the access point should be controlled. These details are mandatory and would be secured by condition.
522. Cycle storage would be integral within the building shell at lower ground floor level. Access is provided via a dedicated entrance from Haydon Street. The entrance to the building would require control via key, fob or phone application.

523. Emergency egress doors can be manual or electronic operating. The lighting scheme of the site would have to be reviewed to ensure it fits for purpose for the redevelopment of the site.
524. The planned reception area to the building would provide managed access to shared spaces during operational hours for visitors and users. The reception will be permanently resourced.
525. The desire is to allow visitors to attend and find their own way to their destination without having to visit the reception. This can be achieved by way of an appropriate visitor management system which provides a virtual fob (QR code or similar) which allows access only to the appropriate area of the building.
526. Further details of the overall security strategy will be required by condition and a Visitor Management Plan will be required through the Culture Management Plan secured by S106 which will detail more specifically the measures to protect the Culture/Community Offer at Writers House.
527. The proposal, subject to conditions and S106 obligations is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

Fire Statement

528. A Stage 2 Fire Strategy and London Plan Fire Statement has been submitted outlining the fire safety strategy for both buildings, the redeveloped building at 30- 33Minories and the retained and refurbished Writers House building. 30-33 Minories will be provided with two firefighting stairs and a firefighting lift, whilst Writers House will be using the existing external fire escape stairs. The City District Surveyor's office has reviewed the submitted fire statement and has raised no further comments. It is considered that the statement adequately covers the relevant fire aspects of the design and is in accordance with policies D5 and D12 of the London Plan. The Fire Statement is therefore adequate for the planning stage and is secured by condition.

Land contamination

529. Policy DM 15.8 of the Local Plan states that *"Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and*

prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.” The same requirements are also set out in Policy HL4 of the City Plan.

530. The application supported by a Phase 1 Contamination Report based on a desk top study. From reviewing the Groundsure data, the site has comprised of many different uses since 1872, including a blacksmith to the northern extent of the site, which is considered to be a potentially contaminative land use. There are also other potentially contaminative land uses within a 250 m radius of the site. The site is located within an area at high risk of UXO, and therefore, it is considered likely that UXO is present on site. The site has also been assessed for other potential pollution pathways. Based on the findings of the potential pollutant linkages measures are recommended, including good demolition and construction practices, ground gas monitoring, management of any asbestos-containing materials in accordance with The Control of Asbestos Regulations (2012), use of clean soils to planters, appropriate surface water drainage strategy and use of good construction practices, such as suppression measures. Overall it is concluded that with the incorporation of mitigation measures, the contamination risk would be Negligible.
531. The Environmental Health Officer has been consulted and has suggested the imposition of a condition to submit an investigation and risk assessment to establish if the site is contaminated and to determine the potential for pollution prior to any works except demolition. Where remediation is required this would have to be completed and a verification report to be submitted to the Local Planning Authority for approval.

Planning Obligations and Community Infrastructure Levy

532. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
533. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
534. 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).

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

MCIL2 Calculation

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	£2,562,950.28	£2,460,432.27	£102,518.01

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£1,056,375.00	£1,003,556.25	£52,818.75
City Planning Obligations			
Affordable Housing	£704,250.00	£697,207.50	£7,042.50
Local, Training, Skills and Job Brokerage	£422,550.00	£418,324.50	£4,225.50
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£291,174.00	£291,174.00	£0.00
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£100,000.00	£100,000.00	£0.00
S106 Monitoring Charge	£5,000	£0.00	£5,000
Total liability in accordance with the City of London's policies	£2,563,720.00	£2,494,474.75	£16,268

City Planning Obligations

536. The obligations set out below are required in accordance with the CoL'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 to meet the tests under regulation 122 of The Community Infrastructure Levy Regulations 2010 and government policy.

Heads of terms

- Highway Reparation and other Highways Obligations
- Construction Monitoring Costs (£53,820 for the First Year of Development and £46,460 for subsequent years)
- Local Procurement Strategy
- Local Jobs, Employment, Training and Skills Plan (Demolition / Construction)
- Affordable Workspace at Writers House Management Plan
- Co-working Space, Incubator and Start Ups Space
- Delivery and Servicing Management Plan (including Consolidation and a dedicated servicing bay)
- Workplace Travel Plan, Travel Plan Co-ordinator and Cycle Promotion Plan
- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Section 278 and 38 Agreements (CoL)
- Public Routes (Specification, Public Access & Management Plan)
- Public Realm Spaces (Specifications, Public Access & Public Realm Management Plan including open space at Sheppy Place)
- Community/Cultural Implementation Strategy (including Cultural Programme, public art installation, educational, cultural and community facilities at Writers House)
- Cultural and Visitor Management Plan
- Platform Lift at Writers House
- Archaeology Preservation Plan for Abbey of the Minoreesses of St. Clare without Aldgate
- Archaeological Remains Display and Visitor Management Plan
- Guinness Estate Residential Amenity Space
- Wind Audit Assessment

537. It is requested that delegated authority is given to officers to continue to negotiate and agree the terms of the proposed obligations as necessary and enter into the S106, S278 and S38 agreements.

538. The scope of the s278 and S38 agreements may include, but is not limited to (subject to evaluation and design work):

St Clare Street

- Reinstatement of the carriageways in cobblestone
- Reconstruction/formation of footways in Yorkstone paving
- Provision of crossovers
- Removal of redundant dropped kerbs
- Alteration to the public highway boundary
- Additional pedestrian space provided

Minories

- Reinstatement of the footways fronting the site in Yorkstone paving
- Resurfacing of the carriageways fronting the site
- Improvements to pedestrian crossing points

Haydon Street

- Widening of the footways fronting the site along with accommodation works, to suit new site layout and achieve acceptable pedestrian comfort levels
- Resurfacing of the carriageway fronting the site

Corner of Minories and Haydon Street

- To be dedicate as public highway

539. And any other associated highway works deemed necessary to integrate highways arrangements.

Monitoring and Administrative Costs

540. 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.

541. 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.

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

542. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, 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.
543. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation.
544. It is the view of officers that a decision to grant permission, subject to a condition securing the provision of a wheelchair accessible lift within Writers House to provide access to the upper floor affordable workspace, would remove or minimise disadvantages suffered by persons who suffer from a disability and in particular mobility impairment by providing enhanced and accessible public realm. Given that the existing blue badge bays on the public highway cannot be guaranteed for employees or visitors accessing the proposed development, it is considered that suitable alterations would be required to be made to the plans submitted to provide at least one disabled parking bay on site. This will be secured by condition. The provision of accessible floorspace and publicly accessible culture and community space within Writers House would advance equality of opportunity.

Human Rights Act 1998

545. 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”)).
546. 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 residential 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. Although it is recognised that the development would have some impact on the amenities of the nearby residents, by way of loss of light and noise and disturbance during constructions, it is not considered that the proposal would result in unacceptable impact on the existing use of nearby residential properties to an extent that would warrant refusal of the application on those grounds. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to

conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace contributing to the City's primary business and professional services function, and the provision of a community/cultural offer and affordable workspace in Writers House, outweighs the adverse impacts on nearby residential properties and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.

547. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference, in these circumstances, is in the public interest and proportionate.

Conclusions and Overall Planning Balance

548. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.
549. The proposed development comprises the demolition of the existing building at 30-33 Minories and partial demolition of Writers House and the erection of an office-led building comprising a 12-storey building with lower ground, one basement level and ground floor (with mezzanine). The proposal would also involve the refurbishment of Writers House, to accommodate affordable workspace to the upper floors and cultural/community uses at ground and basement level. The redevelopment proposed delivers a high quality, office-led development, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses.
550. The site is located within Aldgate Key City Place and the scheme would provide a significant uplift in flexible Grade A office floorspace (12,253sqm) and an increase in the number of full-time jobs (1,906 proposed full-time jobs) to support the regeneration of the area, in accordance with Policy CS8. The floorspace uplift from the proposed development would deliver nearly 2.2% of this remaining floorspace target. The proposed office floorplates are designed to be flexible to be subdivided and arranged in a number of ways to accommodate a range of office occupiers. Therefore, the proposed development would support the strategic objectives of the development plan and the emerging City Plan. The economic benefits of the proposed development would be material and would weigh in favour of the proposed development.

551. The proposed development would also provide a maximum of 1,997sqm GIA of town centre uses (use classes E(a-d) (g(i)) and Sui Generis) including a mixture of retail, food and beverage and sports uses. Active retail frontage would be retained across the ground floor along Minories and Haydon Street. Therefore, the proposal would support the main function of the City and the aims of the development plan to support mixed commercial uses within the office-led development at ground floor to activate street spaces, which would contribute to the City's economy and character and also provide support for the businesses, workers and residents.
552. Within the significant public benefits of the scheme are the provision of cultural/community facility at lower ground and ground floors of Writers House, with affordable workspace to the upper floors within Writers House. The proposed community activities, including quiet working/studying space, areas for social interaction, activities, events, knowledge sharing and skills development, would result in a new social, flexible, multi-use space which would significantly support the needs of the local residents. Furthermore, the provision of 710sqm GIA affordable workspace, would fulfil the City's vision in providing inclusive workspace, in accordance with Policy S4 of the emerging City Plan and Policy E1 of the London Plan. The cultural offer would be provided, in partnership with the Museum of London Archaeology (MOLA), through a permanent display of archaeological artifacts at lower ground floor and other events. A public art installation would also be commissioned to local artists at the public open space (Sheppy Place). The development would support existing, important, metropolitan tourist destinations including Tower of London and Tower Bridge. Overall, the proposals accord with the City's broader visions to deliver outstanding places, as part of 'Destination City', 'City Recharged' (2020), 'Future City' (2021) and 'Culture and Commerce' (2021).
553. It is considered that the proposal would make the best use of land, following a design-led approach that optimises the site's capacity to accommodate growth and would assist in the regeneration of the Aldgate Area as an attractive office, in accordance with the Local and London Plan Policies.
554. The proposals would successfully mediate the changes in scale in its local townscape and would significantly enhance the wider street block within which it sits. The stepped massing, distinctive sense of separate blocks, highly articulated design, materials, varied tones of colour and intended quality would introduce a well-considered, refined, neighbourly architectural set piece.

555. The development would create a high-quality office-led commercial development alongside creating a new community use within Writers House which would support the needs of the residents at Mansell Street Guinness Estate, in line with Local Plan strategic Policies CS 8: Aldgate and Key Areas of Change Policies in the emerging City Plan 2036 Strategic Policy S19: Aldgate and Tower.
556. It is considered the proposal would constitute Good Growth by design in accordance with Local Plan Policies CS 10 and DM 10.1, emerging City Plan Policy S8 and DE2 and London Plan D3, the policies contained in the NPPF and guidance in the National Design Guide, contextualized by the London Plan Good Growth objectives, GG1-6. The proposals would also align with the mandate of Destination City by improving the public realm and creating a new sense of place in this corner of the City of London.
557. Overall, the proposal would optimise the use of land to deliver a transformative new mixed-use destination for the area. It would result in a diverse mix of use, with curated and programmed publicly accessible spaces, both internal and external, transforming an underutilised site, with little active ground floor uses and limited accessible public realm, to a new commercial and cultural hub for the City and London. It would deliver an enhanced public realm, enhancing convenience, comfort and attractiveness in a manner which optimises active travel and the City's public realm objectives.
558. The improvements to the public realm represent good place making and there would be gains qualitatively compliant with the NPPF design policies, London Plan policies, Local Plan policies, Draft City Plan policies, the City Public Realm SPD.
559. The proposal would preserve the ability to recognise and appreciate the Tower of London as a Strategically Important Landmark, whilst according with the associated visual management guidance on the LVMF. The extent of change the proposed development would have on the wider setting would be limited, the impact on the ability to appreciate the site's OUV would be neutral, and it would not harm the significance of the Tower of London whether in relation to the WHS, the individual listed buildings, or the Scheduled Monument. The proposals would accord with Local Plan Policies CS13, emerging Local Plan policies S11, London Plan Policies HC2, HC3 and HC4 and guidance contained in the LVMF SPG and the LSS.
560. With regard to the impact of the development on designated (Ibex House) and non-designated (Writers House) heritage assets, officers consider that while visible, the high-quality replacement building would not diminish the appreciation of the heritage assets and would result in slight enhancement

to their settings. The significance of the grade II listed building and non-designated heritage asset would be preserved. The development would not harm the setting or the contribution that the setting makes to the significance of other designated heritage assets. The proposals are considered to accord with Local Plan Policies CS 12 and DM12.1, emerging City Plan Policies S11 and HE1, London Plan Policy HC1, having accounted for and paying special regard to s66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant paragraphs 195-214.

561. The proposed development is in an area of archaeological interest, located above the 13th century abbey of St Clare's and within the eastern Roman cemetery. Part of the proposal is to extend the current lower ground floor into the car park area and excavate an additional basement across part of the site. These works, particularly the basement, are expected to have moderate to high impacts on archaeological assets. If during demolition, any ruins of the abbey are found on the site, conditions are recommended to require their preservation and display to the public if they demonstrate a good survival of legible structures. Furthermore, if following removal of the render of the western wall at Writers House, where there are known upstanding remains of the abbey, proves to be in good condition then conditions are recommended to secure the revelation and display of these to the public. Subject to all of the above being secured by condition and relevant planning obligations, it is considered that the identified harm to archaeology would be addressed in accordance with Policies CS12 and DM 12.4 of the London Plan and the requirements of the NPPF.

562. In term of public transport provision, the site has the highest level of public transport accessibility level (PTAL) of 6B. 305 long term and 22 short stay spaces bicycle spaces would be provided with associated shower and locker facilities. The scheme is in compliance with London Plan requirements for long stay parking, however it falls short in meeting the requirement for short stay parking. However, it is considered that additional areas for short stay parking would be able to be identified and this will be secured by condition.

563. Although the development would result in loss of public highway along St Clare Steet, the space lost would be minimal and is currently unusable, due to the minimal width of the footway, being circa 0.2 metres, which effectively constitutes unusable space for pedestrian movement. To compensate the loss, the proposal would provide public space that can be adopted as public highway on the southwestern corner of Minories with Haydon Street, which would be larger than the area lost and is considered more valuable due to the significantly higher footfall and currently tight corner. Furthermore, it is considered that the overall impact of the proposal

will have a net benefit to the public highway, due to the reduction of the car parking spaces and effectively the vehicle trips, the provision of consolidated servicing vehicle movements off-street for both the new building on Minories and Writers House, the provision of high quality long and short stay cycle parking and introduction of new public space to the north of Writers House (Sheppy Place) and along Minories. The alterations to the public highway would be secured through a S278 agreement.

564. Whilst the proposed development would result in full redevelopment of the building at 30-33 Minories and therefore in higher whole life-cycle carbon emissions compared to retention scenarios, alternative light and major refurbishment options were explored and they were also reviewed by a third-party expert, who confirmed that the optioneering has been carried out in compliance with the CoL's Carbon Options Guidance. It is considered that the redevelopment option would have the opportunity for greater floor to ceiling heights and an optimised structural grid layout throughout the whole development which would provide greater spatial and operational efficiency and offer higher quality and more flexible, grade A commercial office space, and it would result in the most effective use of the land. The redevelopment would also be able to offer additional, wider environmental benefits including significant uplift in greening and biodiversity, end of trip facilities supporting active travel, and greater climate resilience including reduced risk of overheating and flood risk, and therefore is considered to be the preferred long-term option.
565. Currently the site provides very limited urban greening. The proposed development will deliver considered urban greening through a number of soft landscaped terraces and balconies, achieving an urban greening factor (UGF) score of 0.3 / 0.34 (using the London Plan and CoL factors respectively), 8.5 times more than the existing condition. The Proposed Development will have a habitat units value of 0.35 in comparison to the existing site which has a habitat units value of 0.02 resulting in a net biodiversity gain of 0.33 (over 1,645%).
566. Objections have been received from statutory residents of the Guinness Estate, Marlyn Lodge and Fenchurch House, objecting mainly on the grounds of noise, disturbance, dust, overheating, residential amenity and loss of daylight and sunlight. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.
567. With regard to impacts on daylight and sunlight, Fenchurch House (136-138 Minories) would experience Minor to Moderate Adverse effects, whilst the flats at 27 Minories would experience Major Adverse effects. Despite failures against the BRE guidelines, it is not considered that the proposal would result in an unacceptable impact on the existing use of the

properties in the context of the location of the site in a dense urban area on an identified regeneration area and also considering the nature of the rooms that are affected (bedrooms and a kitchen/diner that also benefits from other sources of daylight). As such, the extent of harm is not considered to be such that to cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. In any event, it is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City and contributing to the City's primary business and professional services function, outweighs any adverse impacts.

568. Negative impacts during construction would be controlled as far as possible by the implementation of Schemes of protective works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein. It is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.
569. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.
570. It is the view of officers that as a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 complied with, and as London Plan policy E1, are complied with, and no harm has been identified to result in non-compliance with the Policies of the Local Plan, the emerging City Plan or the London, it is considered that the development would be acceptable and in compliance with the development plan when considered as a whole.
571. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as material planning considerations weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the Schedule attached.

Appendix A

Background Papers

Representations:

- Miss Hannah Johnson - 27.06.2023
- Panagiota Markaki - 28.06.2023
- Ms Carrie Hardie - 29.06.2023
- Mrs Celine Lutz - 29.06.2023
- On top of the above is comments, a petition has been submitted. This is registered on Idox as 'Petition Consisting 44 Signatures' – 30.06.2023
- Mr Roger Jones - 30.06.2023
- Miss Sohima Ali - 30.06.2023
- Jason Pritchard (Common Councillor for Portsoken Ward) - 30.06.2023

Appendix B

London Plan Policies

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction

Relevant GLA Supplementary Planning Guidance (SPG):

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016).
- Mayor's Transport Strategy (2018)

Local Plan Supplementary Planning Guidance

- Air Quality SPD (CoL, July 2017);
- Archaeology and Development Guidance SPD (CoL, July 2017);
- City of London Lighting SPD (CoL, October 2023);
- City Public Realm SPD (CoL, July 2016);
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014);
- Open Space Strategy SPD (CoL, January 2015);
- Protected Views SPD (CoL, January 2012);
- Planning Advice Notes on Sunlight City of London Wind Guidelines (2019);
- City of London Thermal Comfort Guidelines (2020)
- Planning Obligations SPD (CoL, May 2021)

Relevant Draft City Plan 2036 Policies

- Policy S1 Healthy and inclusive city
- Policy HL1 Inclusive buildings and spaces
- Policy HL2 Air quality
- Policy HL3 Noise and light pollution
- Policy HL4 Contaminated land and water quality
- Policy HL5 Location and protection of social and community facilities
- Policy HL9 Health Impact Assessments
- Policy S2 Safe and Secure City
- Policy SA1 Crowded Places
- Policy SA3 Designing in security
- Policy HS3 Residential environment
- Policy S4 Offices
- Policy OF1 Office development
- Policy S5 Retailing
- Policy S6 Culture, Visitors and the Night -time Economy
- Policy S7 Smart Infrastructure and Utilities
- Policy S8 Design
- Policy S9 Vehicular transport and servicing
- Policy CV2 Provision of Visitor Facilities

- Policy CV5 Public Art
- Policy DE1 Sustainability requirements
- Policy DE2 New development
- Policy DE3 Public realm
- Policy DE6 Shopfronts
- Policy DE8 Daylight and sunlight
- Policy DE9 Lighting
- Policy VT1 The impacts of development on transport
- Policy VT2 Freight and servicing
- Policy VT3 Vehicle Parking
- Policy S10 Active travel and healthy streets
- Policy AT1 Pedestrian movement
- Policy AT2 Active travel including cycling
- Policy AT3 Cycle parking
- Policy S11 Historic environment
- Policy HE1 Managing change to heritage assets
- Policy HE2 Ancient monuments and archaeology
- Policy HE3 Setting of the Tower of London World Heritage Site
- Policy S13 Protected Views
- Policy S14 Open spaces and green infrastructure
- Policy OS1 Protection and Provision of Open Spaces
- Policy OS2 City greening
- Policy OS3 Biodiversity
- Policy S15 Climate resilience and flood risk
- Policy CR1 Overheating and Urban Heat Island effect
- Policy CR3 Sustainable drainage systems (SuDS)
- Policy S16 Circular economy and waste
- Policy CE1 Zero Waste City
- Policy S20 Aldgate, Tower and Portsoken
- Policy S27 Planning contributions

Relevant Local Plan Policies

CS1 Provide additional offices

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

CS2 Utilities infrastructure

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

CS3 Security and Safety

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

CS4 Planning contributions

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

CS8 Aldgate

To regenerate the amenities and environment of the Aldgate area for businesses, residents, workers, visitors and students, promoting development and investment.

CS10 Design

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

CS11 Visitor, arts and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

CS12 Historic environment

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

CS13 Protected views

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

CS15 Sustainable development and climate change

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

CS16 Public transport, streets and walkways

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

CS17 Waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

CS18 Flood risk

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

CS19 Open spaces and recreation

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

CS20 Retailing

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

CS21 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.

CS22 Social infrastructure and opportunity

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM1.2 Assembly and protection of large office development sites

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

- a) assist developers in identifying large sites where large floorplate buildings may be appropriate;

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

DM1.3 Small and medium business units

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

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

DM1.5 Mixed uses in commercial areas

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

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

- a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
- b) reasonable gas and water supply considering the need to conserve natural resources;

- c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
- d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
- e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

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

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

DM3.2 Security measures

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

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

DM3.3 Crowded places

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

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

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

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

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

- a) immediately overlook residential premises;
- b) adversely affect rooflines or roof profiles;
- c) result in the loss of historic or locally distinctive roof forms, features or coverings;
- d) impact on identified views.

2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

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

DM10.8 Access and inclusive design

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

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

DM11.2 Public Art

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

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

DM12.1 Change affecting heritage assets

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

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

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

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;

b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;

c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

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

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

DM15.7 Noise and light pollution

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

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

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

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

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

DM15.8 Contaminated land and water quality

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

DM16.1 Transport impacts of development

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

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

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

DM16.2 Pedestrian movement

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

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

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

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

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

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

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

DM16.3 Cycle parking

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

DM16.4 Encouraging active travel

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

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

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

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

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:

- a) be publicly accessible where feasible; this may be achieved through a legal agreement;
- b) provide a high quality environment;
- c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
- d) have regard to biodiversity and the creation of green corridors;
- e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

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

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

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

- a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
- b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

SCHEDULE

APPLICATION: 23/00365/FULMAJ

30 - 33 Minories And Writers House 13 Haydon Street London

Demolition of existing building at 30-33 Minories and partial demolition of The Writers House and erection of a building comprising lower ground, one basement level and ground floor (with mezzanine) and 12 storeys above (69.005m AOD) for office use (Class E) and town centre uses (Classes E and Sui Generis). Refurbishment of Writers House, 13 Haydon Street for office use (Class E) and cultural/community uses (Classes F1, F2 and Sui Generis). Provision of new public realm, dedicated servicing bay, ancillary cycle parking and plant and other associated highway works.

CONDITIONS

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

- 2 (a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.
(b) Prior to commencement of the development, excluding demolition: a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages reuse and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order

to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

- 3 No later than 3 months after completion of the building at 30-33 Minories, 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.
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.
- 4 Prior to the commencement of the development, excluding demolition of the development a detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the Whole Life-Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's Aspirational Benchmark set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life-cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Page 146 Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.
- 5 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied, a post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting

evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

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

- 6 Prior to the commencement of the development, excluding demolition of the development a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

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

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

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

- 8 Prior to the commencement of development, excluding demolition, 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 type, 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.

REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan policies: CS15, DM15.1, DM15.2 and Draft City Plan 2036 policies DE1 and CE1.

- 9 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 10 Within 6 months of completion of the development 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.
REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2036 policy OS2 City Greening and OS3 Biodiversity.
- 11 Prior 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.

REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2036 policy OS3 Biodiversity.
- 12 Post construction BREEAM assessments for all uses, demonstrating that at least a target rating of 'Excellent' has been achieved, shall be submitted as soon as practicable after practical completion.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 13 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, blue roofs, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 3.17 l/s from each outfall and from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 170m³ ;

(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.

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.

- 14 Before the shell and core of the building at 30-33 Minories 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.

- 15 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. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

- 16 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. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

- 17 Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.

REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 18 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 19 All unbuilt surfaces, including the ground floor and landscaping, shall be treated in accordance with a landscaping scheme, including details of:

- a) Irrigation;
- b) Provision for harvesting rainwater run-off from road to supplement irrigation;
- c) Spot heights for ground levels around planting pit;
- d) Soil;
- e) Planting pit size and construction;

- f) Tree guards; and
- g) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development.

to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

- 20 14. Before any works hereby affected are begun, details of a holistic urban greening strategy, including hard landscaping, materials and an appropriate maintenance regime for
- a. the green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;

- b. the incorporation of blue roofs into roof surfaces; and
- c. the landscaping of the public realm

Shall be submitted to and approved in writing by the Local Planning Authority before the above works are commenced. All development pursuant to this permission shall be carried out in accordance with the approved details and maintained as approved for the life of the development unless otherwise agreed and approved by the local planning authority.

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

- 21 No live or recorded music shall be played in any commercial usage 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.

- 22 The Class E/Sui Generis use hereby permitted shall not be open to customers between the hours of (23:00) on one day and (07:00) on the following day.

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

- 23 Unless otherwise approved by the Local Planning Authority the doors and windows to any bar or restaurant shall be kept closed. The doors may be used only for access or egress and in an emergency or for maintenance purposes. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 24 (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.
- 25 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein and should include the provision of noise mitigation measures in the periphery of site in the form of an acoustic insulation sheeting. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).
- REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 26 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 and should include the provision of noise mitigation measures in the periphery of site in the form of an acoustic insulation sheeting. 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.

- 27 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

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

- 28 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 restaurant 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 restaurant 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.

- 29 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
- 30 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.
Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.
REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 31 Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.
Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

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

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

- 32 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

- 33 No cooking shall take place within any commercial kitchen hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

- 34 Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

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

- 35 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.

- 36 The roof terraces and balconies hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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

- 37 Before any work hereby authorised (excluding demolition to slab level) begins the applicant shall secure the implementation of a programme of archaeological evaluation and monitoring of site investigation works in accordance with a stage 1 written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

- 38 Before any work hereby authorised (excluding demolition to slab level, archaeological evaluation and site investigation works) begins the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a stage 2 written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority and shall include the statement of significance and research objectives, and

1. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
2. Details of a programme for delivering related positive public benefits, including opportunities to view archaeological fieldwork in progress and finds from the investigation.

3. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

39 Before any work hereby authorised (excluding demolition to slab level, archaeological investigations and site investigation works) begins, the applicant shall submit a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods. The submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy. The detailed scheme will need to be approved in writing by the Local Planning Authority and the development shall only be carried out in accordance with the approval given.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

40 Before the commencement of below ground works or impacts, the applicant shall carry out archaeological mitigation in accordance with the approved archaeological written schemes of investigation (WSIs) which have been submitted to and approved in writing by the Local Planning Authority. The below-ground works should only be carried out in accordance with any such approval given and in compliance with the method set out in the approved WSIs.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

41 In the event that archaeological finds, deposits or structures are found at any time when carrying out the approved development that could be deemed to be of national significance; they shall be immediately protected and work suspended in the immediate relevant area whilst the Local Planning Authority is notified of the discovery and a scheme for their protection, investigation, recording and/or preservation, notwithstanding the approved drawings, shall be agreed and submitted to the Local Planning Authority for approval in writing.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

42 Within 12 months of the completion of archaeological fieldwork a post-excavation assessment and updated project design (PXA/UPD) including historic unpublished archives relating to the site shall be submitted to and approved in writing by the Local Planning Authority. This part of the condition shall not be discharged until the post-

excavation work has been completed in accordance with the programme set out in the PXA/UPD.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

- 43 Before any work hereby authorised begins, a strategy for uncovering and temporarily protecting the medieval remains in the west wall and associated areas of Writers' House shall be submitted to and approved in writing by the Local Planning Authority.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 44 Before any work hereby authorised begins, the west wall of the Writers House shall be uncovered and temporarily protected in accordance with the strategy approved by the Local Planning Authority. Details of the conservation, consolidation and display to the public of the archaeological remains thereby uncovered, notwithstanding the approved drawings, shall be submitted to and approved in writing by the Local Planning Authority.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 45 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.
REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.
- 46 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's

Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

- 47 Prior to the commencement of the Section 278 design works a Pedestrian Comfort Level Assessment shall be submitted to and approved in writing by the Local Planning Authority. The Assessment shall meet Transport for London guidelines in order to confirm the impact of the development prior to agreeing highways mitigation. REASON: To ensure that pedestrian movement is facilitated by the provision of suitable pedestrian routes around the site in accordance with the following Local Plan policies: DM 16.1 and DM 16.2.
- 48 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. 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.
- 49 Notwithstanding the submitted details, before any construction works hereby permitted are begun revised details of the layout of short stay cycle parking to be located outside the building but within the ownership boundary of the site shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3, and emerging policy AT3 of the Draft City Plan 2036.

- 50 Notwithstanding the submitted details, before any construction works hereby permitted are begun revised details of the layout providing a blue badge car parking bay within the boundaries of the application site shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

REASON: To ensure provision is made for car parking for disabled people in accordance with the following policy of the Local Plan: DM16.5, and London Plan policy T6.5.

- 51 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the buildings sufficient to accommodate a minimum of 305 long stay spaces and 41 short stay spaces. All doors on the access to the parking area shall be automated, push button or pressure pad operated. The cycle parking provided on the site must remain ancillary to the use of the buildings and must be available at all times throughout the life of the buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.

REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3, and emerging policy AT3 of the Draft City Plan 2036.

- 52 44. A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.

REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy TS cycling, emerging City Plan policy 6.3.24.

- 53 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 31 showers and 204 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.

REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

- 54 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless

the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

- 55 Details of a 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 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.

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.

- 56 Minimum of one electric charging point must be provided within the delivery and servicing area and retained for the life of the building.
REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16.

- 57 Before the demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
- a. Provide an overview of the overall development including both design on temporary and permanent works.
 - b. Provide detailed design and Risk Assessment and Method Statement (RAMS) for the demolition works
 - c. Identify and accommodate the location of the existing London Underground structures
 - d. Demonstrate that any EMC emissions from any plant or equipment to be used on the site or in the finished structure will not adversely affect LU equipment or signalling
 - e. Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works
 - f. Assess structure/tunnel impact due to ground movement arising from different stages of temporary and permanent works
 - g. Mitigate the effects of noise and vibration arising from the adjoining railway operations within the structures.
- Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

- 58 Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
- a. Prior to commencement of each phase of the development, provide detailed design for foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent)
 - b. Site specific Risk Assessments and Method Statements (RAMS) for any activities (groundworks, piling) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing.
 - c. Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works
 - d. Assess structure/tunnel impact due to ground movement arising from different stages of temporary and permanent works
 - e. No support to be taken from LU's land or structures.
- Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.
- 59 Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
- a) Provide detailed design for all superstructure works (temporary and permanent)
 - b) Site specific Risk Assessments and Method Statements (RAMS) for any activities (craneage, scaffolding, use of tall plant) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing
 - c) Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works
 - d) Assess structure/tunnel impact due to ground movement arising from different stages of temporary and permanent works
 - e) No support to be taken from LU's land or structures.
- Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.
- 60 No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind

mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.

REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 61 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2.

- 62 55. 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.
 - details of aviation lights including locations
- All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 , CS15, emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036 and the City of London Lighting SPD 2023.

- 63 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.

- 64 There shall be no high level external lighting of the external facades.

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

- 65 Before any construction work hereby permitted are begun, a scheme indicating the provision to be made for disabled people to gain access to all areas including all levels of retail units (Class E (a) (b) (c) (d) (e) (f)) shall be submitted to and approved in writing by the Local Planning Authority. The agreed scheme shall be implemented in accordance with the approved details before the development hereby permitted is brought into use.

REASON: To ensure that the development will be accessible for people with disabilities 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.

- 66 59. Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces;
 - (b) details of the proposed new external and semi-external facades including details of a typical bay detail the development for each façade including jointing where appropriate;
 - (c) mock up sample of the glazing system to test solar glare

- (d) details of the rooftop including any plant equipment and the roofscape;
- (e) details of ground and first floor elevations including all entrances, lifts, escalators, façade materials, columns and the digital screen;
- (f) full details of the of the ground floor public spaces, including flooring, entrances, fenestration, planters, seating, lighting, soffits, drainage, irrigation, vehicle lifts, roller shutters and any infrastructure required to deliver programmed and varied uses;
- (g) full details of the western garden space, including all elevations, surface treatments, planters, seating, lighting, soffits, the water feature, drainage, irrigation and any infrastructure required to deliver programming and varied uses;
- (h) details of soffits, hand rails and balustrades;
- (i) details of the retail kiosks, including any infrastructure required;
- (j) details of the drinking fountain;
- (k) details all party wall treatments;
- (l) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
- (m) details of all drainage, irrigation and rainwater harvesting;
- (n) details of the integration of M&E and building services into the external envelope;
- (o) details of canopies; and
- (p) typical of any masonry details, including jointing and any necessary expansion/movement joints.
- (q) details of the supporting columns including the interface at ground level
- (r) details of the escalators and entrances into the office lobby
- (s) details of all proposed entrances including lifts
- (t) details of roof top terrace platform

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, DMI0.1, DMI0.5, DM12.2.

- 67 Prior to occupation of the building the following details relating to signage shall be submitted to and approved in writing by the Local Planning Authority and all signage placed on the development site shall be in accordance with the approved details:
- (a) A Signage strategy for the retail units/kiosks within the development shall be submitted;
 - (b) A Signage strategy relating to the free public viewing gallery and platform space shall be submitted and this strategy shall make provision for clear signs to be placed in prominent positions on the development site, including signage indicating the access point for the publicly accessible free space and culture offer; and
- All signage relating to the public viewing gallery, platform area and cultural space (as approved in the signage strategy) must be erected

and in place on the development site prior to occupation of the building.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.

- 68 Prior to the occupation of the buildings, the applicant is required to submit to the Local Planning Authority for approval of a wayfinding strategy. The developer is to consider the implementation or removal of legible London signage within the site and surrounding locations. The extent of the works should be agreed with TFL, prior to submission.
REASON: In the interests of visual amenity and satisfactory pedestrian circulation of the site, in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

- 69 Notwithstanding the details shown on the drawings, before any works thereby affected are begun, details of measures to prevent jumping or falling from the development shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development.
REASON: In the interests of safety in accordance with the following policies of the draft City Plan 2036: DE2 and DE5.

- 70 Before any works thereby affected are begun detailed plans, elevations and sections including spot heights of the roof level shall be submitted to and approved in writing by the Local Planning Authority to ensure sufficient design quality and the protection of the heritage significance of surrounding designated heritage assets.
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 and to ensure design quality and the protection of the heritage significance of surrounding designated heritage assets in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.3, CS13 and emerging policies SE1, DE2, DE6 and HE1 of the Draft City Plan 2036.

- 71 Before any construction work within Writers House hereby permitted are begun, details of the proposed platform lift to provide access to the ground and lower ground floors 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.
REASON: To ensure that the development will be accessible for people with disabilities 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.

- 72 Before any construction work within Writers House hereby permitted are begun, details of a wheelchair accessible lift providing access to the affordable workspace floors within Writers House, 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.
REASON: To ensure that the development will be accessible for people with disabilities 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.
- 73 Prior to the occupation of the buildings, details of an Access Management Plan 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.
REASON: To ensure that the development will be accessible for people with disabilities 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.
- 74 A Waste Management Plan to include details of backloading of waste onto delivery vehicles from the consolidation centre 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 Waste Management Plan (or any amended Waste Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.
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.
- 75 A revised air quality neutral assessment for building emissions that assesses the generator and diesel sprinkler emissions must be submitted.
REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan.

- 76 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 Stage 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.
- 77 Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.
REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.
- 78 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.
- 79 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety.

- 80 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers. REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1
- 81 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 82 Unless otherwise approved by the LPA no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 83 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 84 The threshold of the private public realm and public route entrances shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 85 The windows on the west elevation of the building at 30-33 Minorities hereby approved fronting the residential windows on the east elevation of 27 Minorities shall only be glazed in obscure glass (the glass to be obscure to at least Level 4 on the Pilkington Levels of Privacy, or such equivalent as may be agreed in writing with the local planning authority) and fixed shut, except for any top hung fan light which shall be a minimum of 1.7 metres above internal floor level unless otherwise agreed in writing by the local planning authority. In the case of multiple or double glazed units at least one layer of glass in the relevant units shall be glazed in obscure glass to at least Level 4.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policy of the Local Plan: DM21.3.
- 86 Prior to the commencement of the development, excluding demolition, details of all areas that undersail public highway, including floor plans and sections, shall be submitted to and approved in writing by the Local Planning Authority. The development shall then be implemented in

accordance with approved details and be retained as such in perpetuity.

REASON: To ensure that the development does not impact on existing public highway in accordance with the following policy of the Local Plan: DM16.1.

- 87 The development shall provide:
23,603 sq.m of office floorspace (Class E(g(i)));
1,099 sq.m of flexible town centre uses (Class E(a-d) and bar or drinking establishment (Sui Generis))
898 sq.m of flexible town centre uses (Class E(a-d) (g(i)) and bar or drinking establishment (Sui Generis)); and
337 sq.m of Cultural/community use (Class F1(a-e)/F2(b) and bar or drinking establishment (Sui Generis)).
REASON: To ensure the development is carried out in accordance with the approved plans.
- 88 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:
1623-PLP-ZZ-00-DR-A-01100
1623-PLP-ZZ-00-DR-A-02100
1623-PLP-ZZ-00-DR-A-02101
1623-PLP-ZZ-00-DR-A-02102
1623-PLP-ZZ-00-DR-A-02103
1623-PLP-ZZ-00-DR-A-02104
1623-PLP-ZZ-00-DR-A-02105
1623-PLP-ZZ-00-DR-A-02106
1623-PLP-ZZ-00-DR-A-02107
1623-PLP-ZZ-00-DR-A-02108
1623-PLP-ZZ-00-DR-A-02111
1623-PLP-ZZ-00-DR-A-02114
1623-PLP-ZZ-00-DR-A-03100
1623-PLP-ZZ-00M-DR-A-03100
1623-PLP-ZZ-01-DR-A-01101
1623-PLP-ZZ-02-DR-A-01102
1623-PLP-ZZ-03-DR-A-01103
1623-PLP-ZZ-04-DR-A-01104
1623-PLP-ZZ-05-DR-A-01105
1623-PLP-ZZ-06-DR-A-01106
1623-PLP-ZZ-07-DR-A-01107
1623-PLP-ZZ-08-DR-A-01108
1623-PLP-ZZ-09-DR-A-01109
1623-PLP-ZZ-01-DR-A-03101
1623-PLP-ZZ-02-DR-A-03102
1623-PLP-ZZ-03-DR-A-03103
1623-PLP-ZZ-04-DR-A-03104
1623-PLP-ZZ-05-DR-A-03105
1623-PLP-ZZ-06-DR-A-03106

1623-PLP-ZZ-07-DR-A-03107
1623-PLP-ZZ-08-DR-A-03108
1623-PLP-ZZ-09-DR-A-03109
1623-PLP-ZZ-02-DR-A-02109
1623-PLP-ZZ-10-DR-A-01110
1623-PLP-ZZ-10-DR-A-02110
1623-PLP-ZZ-10-DR-A-03110
1623-PLP-ZZ-11-DR-A-01111
1623-PLP-ZZ-11-DR-A-03111
1623-PLP-ZZ-11M-DR-A-03111
1623-PLP-ZZ-12-DR-A-01112
1623-PLP-ZZ-12-DR-A-02112
1623-PLP-ZZ-13-DR-A-01113
1623-PLP-ZZ-13-DR-A-02113
1623-PLP-ZZ-14-DR-A-01114
1623-PLP-ZZ-B1-DR-A-03098
1623-PLP-ZZ-LG-DR-A-01099
1623-PLP-ZZ-LG-DR-A-02099
1623-PLP-ZZ-LG-DR-A-03099
1623-PLP-ZZ-RF-DR-A-01115
1623-PLP-ZZ-RF-DR-A-03112
1623-PLP-ZZ-ZZ-DR-A-01200
1623-PLP-ZZ-ZZ-DR-A-01201
1623-PLP-ZZ-ZZ-DR-A-01202
1623-PLP-ZZ-ZZ-DR-A-01203
1623-PLP-ZZ-ZZ-DR-A-01204
1623-PLP-ZZ-ZZ-DR-A-01205
1623-PLP-ZZ-ZZ-DR-A-01300
1623-PLP-ZZ-ZZ-DR-A-01301
1623-PLP-ZZ-ZZ-DR-A-01310
1623-PLP-ZZ-ZZ-DR-A-02202
1623-PLP-ZZ-ZZ-DR-A-02203
1623-PLP-ZZ-ZZ-DR-A-02204
1623-PLP-ZZ-ZZ-DR-A-02205
1623-PLP-ZZ-ZZ-DR-A-02300
1623-PLP-ZZ-ZZ-DR-A-02301
1623-PLP-ZZ-ZZ-DR-A-02310
1623-PLP-ZZ-ZZ-DR-A-03200
1623-PLP-ZZ-ZZ-DR-A-03201
1623-PLP-ZZ-ZZ-DR-A-03202 Rev 01
1623-PLP-ZZ-ZZ-DR-A-03203 Rev 01
1623-PLP-ZZ-ZZ-DR-A-03204 Rev 01
1623-PLP-ZZ-ZZ-DR-A-03205 Rev 01
1623-PLP-ZZ-ZZ-DR-A-03300
1623-PLP-ZZ-ZZ-DR-A-03301
1623-PLP-ZZ-ZZ-DR-A-03310
1623-PLP-ZZ-ZZ-DR-A-31401
1623-PLP-ZZ-ZZ-DR-A-31402
1623-PLP-ZZ-ZZ-DR-A-31403
1623-PLP-ZZ-ZZ-DR-A-31404

1623-PLP-ZZ-ZZ-DR-A-31405
1623-PLP-ZZ-ZZ-DR-A-31406
1623-PLP-ZZ-ZZ-DR-A-31407
(01)050 REV A
(01)100REV B
(01)150 REV A
652010853-SWE-00-DR-TP-0005
652010853-SWE-00-DR-TP-0006
652010853-SWE-00-DR-TP-0007 Rev P03
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 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.
- 2 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.
- 3 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)
- 4 Architect retention
It is advised that the same architect is retained for the discharge of the details of the proposed scheme, to ensure that the quality of the development hereby approved is maintained.

5 Automated doors to Writers House

It is advised that the doors to Writers House from Sheppey Place and Haydon Place are automated doors, with a minimum effective clear width of door leaf no less than 1000mm (Table 2 of Approved Doc M(2)).

Background Papers

Air Quality Assessment, March 2023
Bat Survey Report, March 2023
Biodiversity Net gain, March 2023
Built Heritage, Townscape and Visual Impact Assessment, March 2023
City of London PAN WLCA Optioneering Study, January 2024
WLCA 3rd Party Review, January 2024
Cycling Promotion Plan, March 2023
Delivery and Servicing Plan, March 2023
Draft Construction Environmental Management Plan, March 2023
Drainage Strategy Report, March 2023
Energy and Sustainability Statement (Part 1) & (Part 3), March 2023
Energy and Sustainability Statement (Part 2) – Updated, January 2024
Flood Risk Assessment, March 2023
Health Impact Assessment, March 2023
Land Contamination Assessment, March 2023
Landscape Design Statement, March 2023
Operational Waste Management Plan, March 2023
Outdoor Thermal Comfort Assessment, March 2023
Preliminary Ecological Appraisal, March 2023
Smart Infrastructure and Utilities Statement, March 2023
Stage 2 Fire Strategy and London Plan Fire Statement, March 2023
Security Needs Assessment, March 2023
Statement of Community Involvement, March 2023
Structural Report, March 2023
Wind Microclimate Assessment, March 2023
Wind Microclimate Report, December 2022
Design Addendum 2: Architecture, October 2023
HTVIA Addendum: Built Heritage, Townscape and Visual Impact Assessment,
October 2023
Community Strategy, December 2023
Cover Letter, March 2023
Equality Statement, March 2023
GLA WLCA Worksheet
Part L 2021 Performance
Whole Life-Cycle Carbon Clarifications Correspondence, December 2023
Spreadsheet – Sustainability/WLC Carbon 3rd Part Review, December 2023
Spreadsheet – Sustainability/GLA WLC Carbon Worksheet, December 2023
Email Correspondence re sustainability queries, January 2024
Spreadsheet – Carbon Options Tool 01 – QA – Light refurbishment Update,
January 2024
Façade System – Sustainability, January 2024

Comments for Planning Application 23/00365/FULMAJ

Application Summary

Application Number: 23/00365/FULMAJ

Address: 30 - 33 Minories And Writers House 13 Haydon Street London EC3N 1PE

Proposal: Demolition of existing building at 30-33 Minories and partial demolition of The Writers House and erection of a building comprising lower ground, one basement level and ground floor (with mezzanine) and 12 storeys above (69.005m AOD) for office use (Class E) and town centre uses (Classes E and Sui Generis). Refurbishment of Writers House, 13 Haydon Street for office use (Class E) and cultural/community uses (Classes F1, F2 and Sui Generis). Provision of new public realm, dedicated servicing bay, ancillary cycle parking and plant and other associated highway works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Miss Hannah Johnson

Address: Flat 12 Fenchurch House 136-138 Minories London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: The objection as a neighbour to the proposed plans is due to the following identified factors which both negatively impact the residents of the neighbouring property Fenchurch House, 136-138 Minories:

- The Daylight, sunlight and overshadowing report conducted by Point 2 Surveyors Ltd findings (pages 19 and 20) indicate the VSC daylight reduction is above the 20% guidelines for all floors of Fenchurch House 136-138 Minories with the reduction for the 3rd floor and above being 33.8%. This is a significant reduction in daylight for the neighbouring building which adversely impacts residents
- Increased traffic and noise from deliveries - the plans (document: '23_00365_FULMAJ-DELIVERY_AND_SERVICING_PLAN-781981') highlight an estimated 30 daily deliveries over a 10 hour period, indicating 3 deliveries per hour. This increases traffic on the Minories (the only access to St Clare Street which is the location of the site where deliveries will be received) and additional noise associated with traffic, particularly during the proposed 6.00-23.00 proposed delivery time window suggested. This will adversely impact noise quality for residents as well as air quality from the additional vehicles.

On a commercial basis, the proposed height and scale of the building compared to the existing structure is excessive and the plans highlight it is predominantly made up of office space (23,603m² GIA). Neighbouring office spaces currently have spare capacity, including 80 Fenchurch Street which has nearly 4,000m² of office space to rent. The planned new building height and scale could be significantly reduced - therefore decreasing the negative impact to residents from daylight reductions and a shorter construction timeframe - by decreasing the office space, which is not required in the area.

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Application Reference: 23/00365/FULMAJ - 30-33 Minorities And Writers House 13 Haydon Street London EC3N 1PE, FAO: Anna Tastsoglou
Date: 28 June 2023 20:54:58

THIS IS AN EXTERNAL EMAIL

Your Title: Mrs

Your First Name: Panagiota

Your Surname: Markaki

Address: 603 Marlyn Lodge, Portsoken Street

Town/City: London

Postcode: E1 8RB

Your Email Address: [REDACTED]

Commenter Type: Neighbour

Stance: Object

Reason for comment:

- Noise
- Other
- Residential Amenity

I object to the submitted changes of use of the 13 Haydon Street (Writers House) part of the proposed development and the proposed retail unit along Haydon Street (currently a car park) to Classes E/Town Centre and/or Sui Generis. Should a Class E change be allowed by the Planning Office, this use should be restricted to office use and educational/community space use only and explicitly exclude Class E bars, cafes and restaurants, in order to preserve the residential amenity of the adjacent Guinness Estate and Marlyn Lodge residential buildings. Sui Generis use, which since September 2020 encompasses possible uses such as amusement arcades /centres or funfairs, nightclubs, casinos, drinking establishments with expanded food provision, hot food takeaways, venues for live music performance, dance hall etc. should not be allowed at all, as the Sui Generis use is too wide in its definition and would allow the developer to opt for a series of possible uses which could seriously adversely affect the living standard and residential amenity of our adjacent residencies. In the case of Haydon Street, a dead end street with a potential to quickly be transformed by customers of possible restaurants/cafes/ bars into a beer garden cul de sac, the only change of use allowed should be a Class E office use, to ensure that Marlyn Lodge and the Guinness estate do not face with the Haydon Street development a similar unpleasant experience as we are currently facing with the noisy

Duke of Somerset Pub (15 Little Somerset Street, E1 8AH) and The Minorities Pub (64-73 EC3N 1LA), the outdoor loudspeakers and noisy customers of which frequently pour out from their establishments to the surrounding streets. Any sui generis/Town Centre uses should be limited to the proposed development's retail unit parts directly facing The Minorities, where other bars and restaurants are currently operating, to avoid any antisocial behaviour and litter spilling out towards Haydon street and our buildings.

In addition to the above, the developer should be requested by the planning office to produce a coherent plan for the protection of all residential buildings in the close vicinity of 30-33 Minorities and Haydon street, with measures outlined of how our properties and our health will be protected from any noise, hazardous dust, diamond drilling and demolition dirt and all the other untoward side effects, which shall inevitably follow with such a huge construction project. This is essential to local residents, particularly due to the nature and size of the proposed project. The suggested development will include a significant demolition of existing buildings and years of construction, and there also is the very real possibility that this construction will for many years overlap with the proposed restructuring of the IBEX building (42-47 Minorities, EC3N 1DY) directly next to it. Residents therefore have an expectation that planning officers should exert their utmost due diligence to ensure all building regulations and timeframes of construction are observed by the developers, and that everything which can be done is done in order to ensure that the residential amenities of all homes bordering Haydon street are preserved both during the lengthy construction period and after.

Please acknowledge receipt.

Comments for Planning Application 23/00365/FULMAJ

Application Summary

Application Number: 23/00365/FULMAJ

Address: 30 - 33 Minories And Writers House 13 Haydon Street London EC3N 1PE

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Case Officer: Anna Tastsoglou

Customer Details

Name: Ms Carrie Hardie

Address: 5 Guinness Court Mansell Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: We have had so much building work going on in our area. And fed up with all the noise, the dust. It plays on my health. I don't want this. Plan to be approved.

Comments for Planning Application 23/00365/FULMAJ

Application Summary

Application Number: 23/00365/FULMAJ

Address: 30 - 33 Minorities And Writers House 13 Haydon Street London EC3N 1PE

Proposal: Demolition of existing building at 30-33 Minores and partial demolition of The Writers House and erection of a building comprising lower ground, one basement level and ground floor (with mezzanine) and 12 storeys above (69.005m AOD) for office use (Class E) and town centre uses (Classes E and Sui Generis). Refurbishment of Writers House, 13 Haydon Street for office use (Class E) and cultural/community uses (Classes F1, F2 and Sui Generis). Provision of new public realm, dedicated servicing bay, ancillary cycle parking and plant and other associated highway works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mrs Celine LUTZU

Address: Flat 66 Guinness Court Mansell Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I live in Guinness Court building since mid-2019.

Since then I've ALWAYS unfortunately experienced a building construction opposite my flat. And worst for the past 6 years it has actually been non-stop.

This means non-stop/constant noise pollution and dust.

Contractors keep changing and all of them disregard the working virus which are meant to be quiet.

The dust means more and more residents have breathing issues, lungs badly affected, more people affected with asthma.

We have been living next to a building development for the last 6 years, which has resulted in continuous disruption, noise and dust.

And worst I've already lost lots of natural daylight due to a taller building facing my windows.

And now you're planning to demolish and build a new building even taller, thus reducing even more residents natural daylight.

RESIDENTS HAVE ENOUGH, WE CAN'T CATCH A BREAK, you've got zero respect for residents, we've been living in a building g site for more than 12 years!!!

Also you need to know due to this non-stop buildings going up and down facing my own building where I live with my young children, we just got rid of a 12 months huge mice and rats infestation,

it has been really difficult to be rid of it, the pest control left over 400 poison boxes.

I'll repeat, enough.

Alternative solution to demolish the buildings will be to renovate it, thus reducing the noise and dust pollution and avoid further reduction of natural daylight.

I urge you to please reconsider the residents who live nearby and never had any respite from building works for many years.

Thank you

Kind regards

We the undersigned request that the City of London back the mitigation measures listed below in relation to the Planning Application 23/00365/FULMAJ - Demolition of existing building at 30-33 Minories and partial demolition of The Writers House and erection of a new building.

We have been living next to a building development for the last 6 years, which has resulted in continuous disruption, noise and dust. As part of the mitigation for this development we were given new double glazing, however this has proved ineffective in shielding us from noise, and unworkable in the hot summer months when our apartments overheat without air flow.

We oppose the demolition of Writers House and St Clare house as it will cause enormous noise and dust disturbance. We don't understand how the carbon neutral aims of the City of London will be met by a demolition and rebuild, in the light of this we urge you to consider a refurb and refit as an alternative.

One of the problems for us on the estate is the echoing of noise around all of the hard surfaces (mostly brick) in the immediate area. This has the effect of the noise disturbance being greater than would be expected from a measurement taken at ground level at the periphery of the site. This could be avoided if a proper noise and dust barrier is erected between our estate and the building site - e.g. a scaffolding structure high enough to protect us from sound and dust and using sound deadening materials. This would prevent the sound from entering the area which reflects sounds.

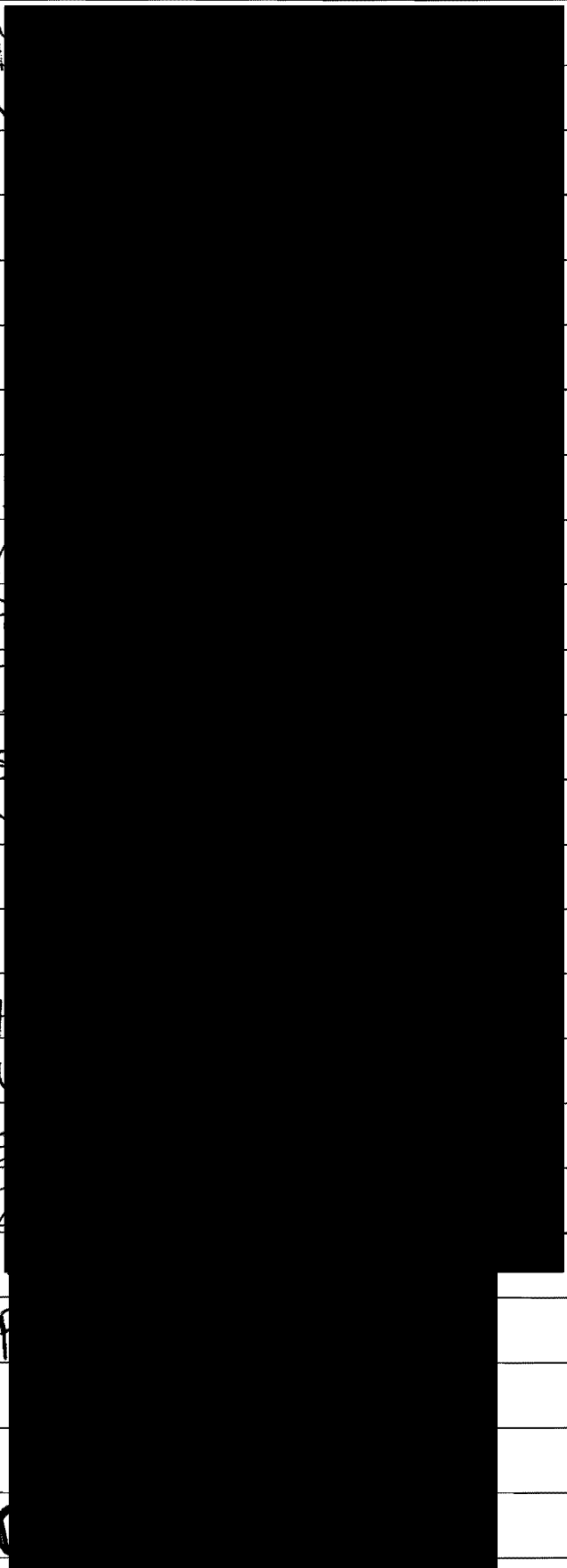
Given the overheating of apartments when windows are closed in an effort to protect us from noise, we think that part of the mitigation for this new development should tackle this problem by providing funding for technical means for cooling these dwellings.

We have had requests for respite areas that residents can use to avoid heat, noise and dust, this could be in nearby hotels, or other accommodation.

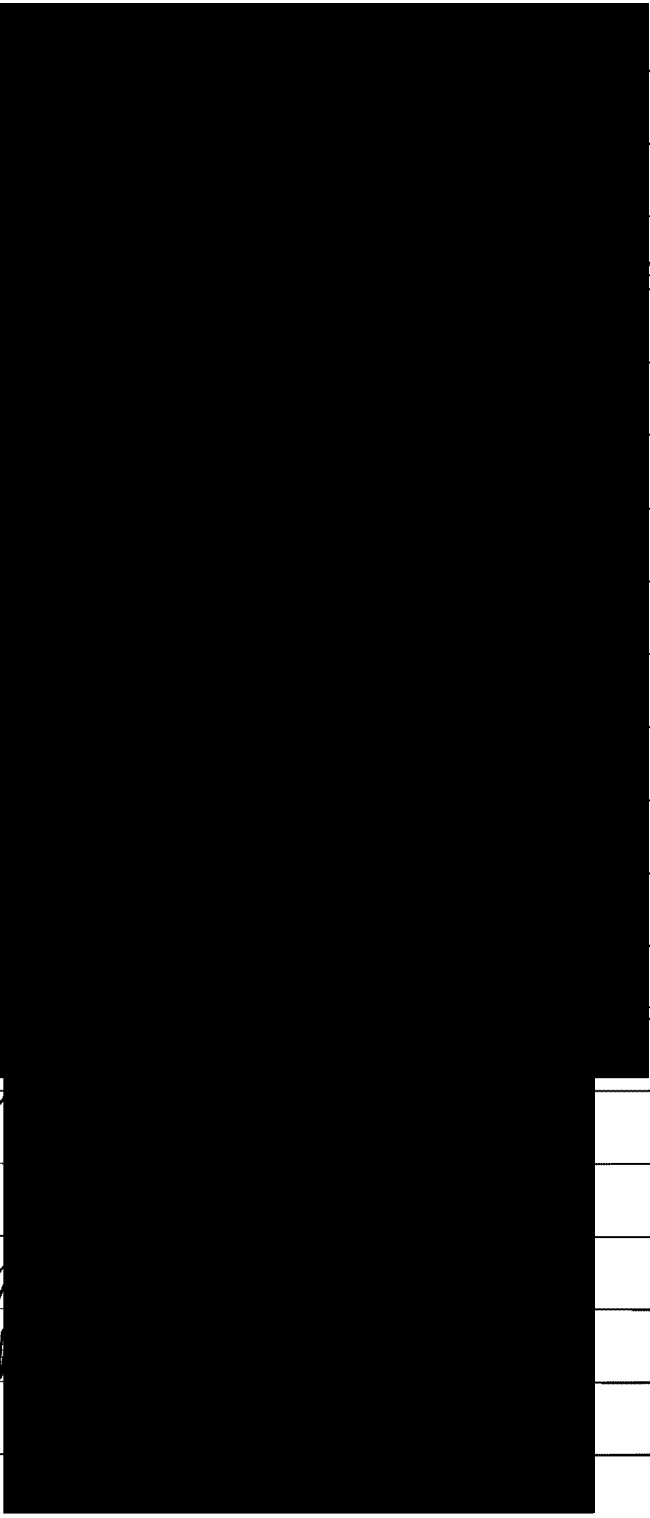
We also oppose weekend working. At the weekend this ambient noise is very low, and so disturbance from a building sites is very noticeable. We urge you to consider a 5 day working week in this site so close to social housing.



VK

Name	Address (e.g. 105 GC, or 12 IC)
	135 - G.C.
	142 G.C.
	121 GC
	122 GT
	119 GC,
	117 GC
	117 GC
	113 GC
	113 GC
	111 GC
	104 GC
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	102 G.C.
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	90
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	73 G.C.
119 GC	
112 GC	
112 GC	
105 G.C.	

Handwritten signature

Name	Address (e.g. 105 GC, or 12 IC)
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	49 IV. C
	51
	38 IV
	27 I.C.
	34
	24
	21 IV.
	20
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	17 IC
	2 I.C
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	14. IVENGH C.
	13 IVeagh.
12	
10 Iveagh	

Comments for Planning Application 23/00365/FULMAJ

Application Summary

Application Number: 23/00365/FULMAJ

Address: 30 - 33 Minories And Writers House 13 Haydon Street London EC3N 1PE

Proposal: Demolition of existing building at 30-33 Minores and partial demolition of The Writers House and erection of a building comprising lower ground, one basement level and ground floor (with mezzanine) and 12 storeys above (69.005m AOD) for office use (Class E) and town centre uses (Classes E and Sui Generis). Refurbishment of Writers House, 13 Haydon Street for office use (Class E) and cultural/community uses (Classes F1, F2 and Sui Generis). Provision of new public realm, dedicated servicing bay, ancillary cycle parking and plant and other associated highway works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mr Roger Jones

Address: 105 Guinness Court LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: We have been living next to a building development for the last 6 years, which has resulted in continuous disruption, noise and dust. As a result of this experience I would like to request a number of improved mitigation measures.

We oppose the demolition of St Clare House and partial demolition of Writers House as it will cause enormous noise and dust disturbance. We don't understand how the carbon neutral aims of the City of London will be met by a demolition and rebuild, in the light of this we urge you to consider a refurb and refit as an alternative.

One of the problems for us on the estate is the echoing of noise around all of the hard surfaces (mostly brick) in the immediate area. This has the effect of the noise disturbance being greater than would be expected from a measurement taken at ground level at the periphery of the site. This could be avoided if a proper noise and dust barrier is erected between our estate and the building site - e.g. a scaffolding structure high enough to protect us from sound and dust and using sound deadening materials. This would prevent the sound from entering the area which reflects sounds. This I think would be the single most effective measure to help combat the disturbance which may very well last a number of years.

Given the overheating of apartments when windows are closed in an effort to protect us from noise, we think that part of the mitigation for this new development should tackle this problem by providing funding for technical means for cooling these dwellings.

We have had requests for respite areas that residents can use to avoid heat, noise and dust, this could be in nearby hotels, or other accommodation.

We also oppose weekend working. At the weekend this ambient noise is very low, and so disturbance from a building sites is very noticeable. We urge you to consider a 5 day working week in this site so close to social housing.

From: [REDACTED]
To: [REDACTED]
Subject: 23/00365/FULMAJ | Demolition of existing building at 30-33 Minores and partial demolition of The Writers House and erection of a building comprising lower ground, one basement level and ground floor (with mezzanine) and 12 storeys above (69.005m AOD) f...
Date: 30 June 2023 13:40:45

Dear Planning Officer,

I am writing to you as the Common Councillor for Portsoken ward regarding the proposed development at 30-33 Minories and Writers House, 13 Haydon Street is located. I have received numerous complaints from my constituents, who are deeply concerned about the potential impact of this development on their quality of life. I would like to formally object to the planning application on their behalf.

Firstly, my constituents have expressed significant concerns about the proposed demolition of the existing buildings, particularly in light of the City of London's carbon neutral aims. They question whether a demolition and rebuild is the most sustainable option, and suggest that a refurbishment and refit of the existing buildings may be a more environmentally friendly alternative.

Secondly, the residents of the nearby social housing estate have already endured six years of disruption due to ongoing building works. They report continuous noise and dust pollution, which has had a detrimental impact on their living conditions. Despite the provision of new double glazing, the noise pollution remains a significant issue, particularly during the hot summer months when windows need to be open for ventilation.

The residents have suggested that a high, sound-deadening barrier could be erected between the building site and the estate to mitigate the noise and dust pollution. This would be a practical solution to address the echoing of noise around the hard surfaces in the area, which amplifies the disturbance.

Furthermore, the residents have raised concerns about the overheating of their apartments when windows are closed to shield them from noise. They propose that part of the mitigation for this new development should include funding for technical solutions to cool their dwellings.

Finally, the residents strongly oppose weekend working. They argue that the ambient noise is very low at the weekend, making any disturbance from building works particularly noticeable. They request that working hours be limited to weekdays only.

The residents have also suggested the provision of respite areas that they can use to escape the heat, noise, and dust. This could be in nearby hotels or other suitable accommodation.

In conclusion, I strongly urge you to take these objections into account when considering

this planning application. It is crucial that we balance the need for development with the wellbeing of our residents, particularly those living in social housing who may be disproportionately affected by such projects.

I understand that a petition is being submitted which demonstrates the strength of feeling on this issue. If we want to reset our relationship with residents, then the City of London must listen to the voices of residents when they speak on matters such as these.

Yours sincerely,

Jason Pritchard
Common Councilman for the ward of Portsoken
City of London

Comments for Planning Application 23/00365/FULMAJ

Application Summary

Application Number: 23/00365/FULMAJ

Address: 30 - 33 Minorities And Writers House 13 Haydon Street London EC3N 1PE

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Case Officer: Anna Tastsoglou

Customer Details

Name: Miss Sohima Ali

Address: 103 Guinness Court Mansell Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: From the time works has been carried out in Guinness court I had difficulty working home. It had been advised to use the hotel for quiet space which I could not understand why I am being pushed out of my home for a quieter place to work. Were my property is situated I go to the living room I have severe noise coming from the building works then going to my bedroom I have the street noise from buses, motorbikes and people shouting in the street. My home should be a place of comfort and a rest place, now my homes feels like a place I want to escape from. The surrounding from all noise around me has impacted my mental health severely to the point I have become sensitive to noise which leads me to feeling aggregated, snappy to family, having low moods to feelings really heavy on my head.

Works have been carried out yet safety measures have not been put in place. I am one of the many residents who are suffering and I worry for the vulnerable people the elderly residents the resident who actual have been diagnosed with mental health what measures have been put in place.

The average earners are suffering in the process. Once works are completed the rich move in and we receive nothing for our suffering There is no compensation for each householder for the years of noise we have and are suffering. We use our voice however our voice is not being heard. There

needs to be a change before one of the many residents end up having severe mental health.