



Planning Applications Sub-Committee

Date: TUESDAY, 29 OCTOBER 2024

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

Members:

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

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

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

3. **MINUTES**

To agree the public minutes of the Planning Applications Sub-Committee meeting held on 10 September 2024.

For Decision
(Pages 5 - 28)

4. **TENTER HOUSE, 45 MOORFIELDS, LONDON, EC2Y 9AE**

Report of the Director of Planning & Development.

For Decision
(Pages 29 - 590)

5. **65 FLEET STREET, LONDON, EC4Y 1HT - *AMENDED 25/10***

Report of the Planning & Development Director.

For Decision
(Pages 591 - 932)

6. **165 FLEET STREET, LONDON, EC4A 2DY**

Report of the Director of Planning & Development.

For Decision
(Pages 933 - 1042)

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

Report of the Chief Planning Officer & Development Director.

For Information

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

Report of the Chief Planning Officer & Development Director.

For Information

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

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

PLANNING APPLICATIONS SUB-COMMITTEE

Tuesday, 10 September 2024

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Tuesday, 10 September 2024 at 10.30 am

Present

Members:

Graham Packham (Deputy Chairman)
Deputy Randall Anderson
Ian Bishop-Laggett
Deputy John Edwards
Deputy John Fletcher
Deputy Marianne Fredericks
Amy Horscroft
Deputy Charles Edward Lord
Deputy Brian Mooney BEM
Eamonn Mullally
Deborah Oliver
William Upton KC
Jacqui Webster

Officers:

| | | |
|------------------|---|---|
| Zoe Lewis | - | Town Clerk's Department |
| Polly Dunn | - | Interim Assistant Town Clerk |
| Fleur Francis | - | Comptroller and City Solicitor's Department |
| David Horkan | - | Environment Department |
| Samuel James | - | Environment Department |
| Kieran McCallum | - | Environment Department |
| Rob McNicol | - | Environment Department |
| Tom Nancollas | - | Environment Department |
| Joanna Parker | - | Environment Department |
| Gwyn Richards | - | Environment Department |
| Robin Whitehouse | - | Environment Department |
| Peter Wilson | - | Environment Department |

1. APOLOGIES

Apologies for absence were received from Mary Durcan, Anthony Fitzpatrick, Jaspreet Hodgson, Alderman Robert Hughes-Penney, Deputy Shравan Joshi, Alderwoman Elizabeth King, Deputy Natasha Lloyd-Owen, Deputy Alastair Moss, Judith Pleasance, Deputy Henry Pollard, Alderman Simon Pryke, Ian Seaton and Hugh Selka.

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

Deputy Edward Lord stated they were a Governor of the City of London School for Girls and they would therefore not be participating in the consideration of

Agenda Item 5. The Legal Officer stated that the last time the Board of Governors had considered a report relating to this matter was 2021 when they were not a Governor but it was at their discretion whether they wanted to take part. Deputy Edward Lord stated although they were not a Governor at that time they would not participate.

3. **MINUTES**

RESOLVED – That the public minutes of the meeting held on 11 July 2024 be agreed as a correct record subject to the following amendment:

That the reference to File Transfer protocol service in Agenda Item 5 be replaced by FTTP Fibre to the Premise Services.

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

The Sub-Committee considered a report of the Planning and Development Director concerning the partial demolition, extension and change of use of existing office building to Class E co-living accommodation in the form of 174 private units with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

The Town Clerk referred to those papers set out within the main agenda pack as well as the Officer presentation slides and two addenda which had been separately circulated and published. Officers presented the application stating that 45 Beech Street was also known as Murray House. It was a corner property that fronted the Beech Street tunnel to the south, beneath the Barbican Podium and residential Bridgewater House on Bridgewater Street to the north and the Barbican Estate which was also residential was to the rear. The three buildings enclosed a courtyard area and ramped access which led from Bridgewater Street into the basement of the site. The site was not a listed building, and was not in a conservation area, however it was immediately adjacent to The Barbican Estate (Grade II* listed), Barbican Registered Historic Park and Garden (Grade II* listed), and the Barbican and Golden Lane Conservation Area.

Members were shown the existing views from the Barbican Podium looking west, Beech Street looking west from the junction of Beech Street and Bridgewater Street with the tunnel and supporting structures in front of the building entrance, with the building entrance located in the middle of the southern façade and accessed by a number of steps. Members were informed that step-free access was provided via a ramp and a separate door to the west. They were also informed that neither the southern nor eastern ground floor bays offered active engagement of visual interest with the streets they addressed. In the existing view from the southside of Beech Street looking west, Members were shown the floor condition was currently highly compromised by the construction of the tunnel which had created a poor pedestrian environment. The Officer highlighted images from the existing courtyard with the top of the ramp and access to basement.

The Officer stated that the application property, Briar Court and Bridgewater House enclosed a courtyard area and ramped vehicle access. The building was

currently accessed by pedestrians from Beech Street via two separate entrances, one ramped and one stepped. Internally the building did not currently provide step-free access to the lifts due to internal level changes. There were currently seven existing car parking spaces located along the ramp and in the basement and there was an existing UKPN substation to be retained.

Members were shown the existing first floor and ground floor plans. They were also shown the existing front elevation showing the main entrance below the Barbican Podium and were informed that the existing building had a significant amount of telecommunications equipment cluttering the roofscape. Members were also shown the existing Bridgewater Street elevation with a section of the podium and the west and north elevations within the courtyard.

Members were shown plans of the extent of the demolition. They were informed that the core was to be deconstructed, largely due to the need for an additional stairwell for fire safety needed in residential property as well as to improve access and inclusivity within the building. The columns and floor plates were to be retained.

The demolition east elevation showed the removal of the top two full storeys of the building and the plant areas above which equalled 957 square metres of floor space. The proposal was for the major refurbishment with extensions to upper floors. 90% of the substructure, 66% of the super structure and 0% of the facades would be retained.

The Officer stated that the proposal was for the change of use of the building to provide 174 private co-living units as well as communal space. Co-living, also known as large-scale purpose-built shared living was a form of non-self-contained housing, generally made up of at least 50 private rooms together with communal shared spaces and facilities. This was a type of accommodation seen as providing an alternative to traditional flat shares, and it included additional services and facilities, which could include room cleaning, bed linen services and on-site gym facilities, as well as concierge services. In terms of use class, co-living was not defined as C1 which would be a hotel, C2 residential institutions nor C3 which was self-contained housing. It was distinct from those uses and was sui generis use class.

Members were informed the proposal would result in the loss of 5,284 square metres of office floor space. Officers did not consider this to prejudice the primary business function of the city, nor would it jeopardise future assembly or delivery of large office development sites. It would not introduce uses that adversely affected the existing beneficial mix of commercial uses. The Officer stated that it had been demonstrated through viability testing and marketing that the continued use of the building as an office was not viable in the longer term in this largely residential area and therefore the proposed change of use was acceptable in principle. The Officer added that the loss of office was policy compliant, and the site was considered suitable for the proposed co-living use. The scheme had been through affordable housing viability testing and approximately £8.5 million would be secured towards off-site affordable housing

if permission was granted. This element of the application had been subject to third-party review by a financial viability consultant.

Members were informed that the proposed basement would contain several amenities for the future residents, including a gym and workout studio, a TV room and a laundry room. It would also contain the cycle parking for the development, including 134 long stay spaces as well as the plant and refuse storage. The laundry room and gym would provide direct level access into the courtyard amenity area. There would be no vehicle access to the basement.

Members were informed that the proposed ground floor would contain the publicly accessible cafe and co-working space either side of the main reception area. There would be a resident only working area and the combined communal kitchen and dining area for residents. There would also be two bookable rooms, one for dining and one which was described as for multi-use, such as meetings. The Officer highlighted the location of the refuse collection area onto Bridgewater Street. Officers had assessed the quality of the proposed communal spaces to be acceptable, and they were in line with the relevant policies and guidance for co-living development. The primary entrance and ground floor plate would be altered to provide step-free access. The existing courtyard would be resurfaced, the top of the ramp closest to the entrance gate would be levelled off and an accessible parking space would be provided here. There would be no vehicle access to the remainder of the ramp beyond the space. The proposed facilities were suitably inclusive and accessible.

The Officer stated that floors 1-9 would house the private co-living units. A number of different private room layouts were proposed, and the floor areas were either 20 or 21 square metres for each of the standard room types. The floor to ceiling heights would be 2.5 metres. This was in line with the guidance set out in the relevant guidance document and this was considered acceptable. 10% of the rooms were proposed as accessible, which equated to 17, and these would be either 28 or 36 square metres in floor area. The proposed accessible units were considered suitably inclusive and acceptable, with regard to their layout and the layout of the wider building. The accessible units would be prioritised for disabled occupants and details of management and allocation of this, as well as the parking space were to be secured in the Section 106 agreement.

There were some identified shortfalls in the provision of daylight and sunlight to the proposed accommodation and communal facilities. Compared to the BRE guidance, however, officers considered the proposed quality of private accommodation and communal co-living facilities to be acceptable overall due to the variety of spaces proposed and the overall floor areas that would be provided. They would provide future residents with sufficient facilities for sleeping, eating, working, relaxing and storage in line with the guidance document and a full assessment of the daylight and sunlight internally could be found in the officer report.

Members were shown the proposed eighth floor plan. There were private balconies on the southern facing units. It was noted that the existing office building had a roof terrace in a similar location to this. The Officer outlined the proposed ninth floor plan, and the location of the proposed communal roof terrace at the end of a communal corridor. The space would incorporate fixed and unfixed furniture to create a flexible space whilst ensuring inclusivity and safety. Planters would run around the edge of the terrace behind the balustrading to create a planted edge and buffer to the terrace. It was noted that objections have been received due to noise and loss of privacy concerns from the terrace and the proposed development generally.

The Officer stated that overall there had been 66 objections to the proposal, which were summarised in the report and appended in full with amenity impacts assessed from paragraph 361. There would be no direct overlooking from the roof terrace due to the oblique angles between this and neighbouring residential windows. Furthermore, the edge planting would ensure any perceived privacy was retained and the detail of this was recommended to be secured by condition. There would be no harmful overlooking resulting from the proposal generally.

In relation to daylight and sunlight impacts, the proposed development had been identified as having some minor and major adverse impacts upon daylight and sunlight to surrounding residential properties. However, the majority of adversely impacted windows were serving bedrooms and had poor existing daylighting factors. The fact this was a tight-knit urban environment also meant that the existing daylight factors were poor. Officers had assessed the impacts to be acceptable and the daylight sunlight assessment submitted by the applicant had been third-party reviewed by the BRE who agreed with the conclusions and the methodology.

The Officer stated that objections relating to noise and disturbance would be addressed through conditions including restricting the hours of the proposed external amenity area, requiring there to be no music to be heard from outside the premises, nor played in the amenity areas as well as with the operational management plan, which was to be secured in the Section 106 agreement.

The proposed roof plan showed an extensive green roof combined with a photovoltaic solar panel system, the details of which would be secured by condition. The areas of plant were set back from the main roof.

Members were shown the proposed front elevation. It was proposed to build four new storeys, which would deliver an increase of approximately 1,700 square metres of floor space, which meant that approximately 7,000 square metres of total co-living floor space would be provided.

Members were shown the proposed east elevation from Bridgewater Street, and the proposed west and north elevations within the courtyard. The greatest alterations to bulk and massing came from the upward extension from Level 6, increasing the height of the building to a maximum height of 51.3 metres AOD, which included the plant and maintenance rail. The Officer stated that the

building would strike a comparative alignment in height with the two Barbican blocks, which flanked it, and Bridgewater House to the north.

The Officer stated the top of the building was expressed by a series of arched roofs, which on the south were set back from the body of the building, creating private terraces. The arches would be clad in zinc with deep reveals, the soffits of which would be decorated with the white metal batons to provide additional visual interest. The variations in the materiality would add texture and complexity to the roofscape, creating a positive sense of differentiation between 45 Beech Street and the surrounding Barbican blocks, which were cast in white painted concrete.

Members were informed the middle of the building was formed from a repeating bay module, framed by textured GRC (Glass Fibre Reinforced Concrete). The window module had been designed to maximise natural light, prevent overheating and provide natural ventilation through the fixed decorative panel. The windows had been set deeply within the facade to create natural solar shading and a more dynamic facade treatment. The entrances and ground floor bays at the base of the building would be given greater visual interest and prominence through the application of vibrant colour, texture and depth within their bays on Beech Street and Bridgewater Street, which would create a more vibrant and dynamic ground floor below the Barbican podium. This included the new entrance gate to the internal courtyard, which would also be painted in a vibrant orange colour and made from a decorative perforated pattern, enabling visibility into the courtyard. The majority of the ground floor bays, including the ground floor cafe, would be clear glazed to ensure views into and out of the ground floors, again adding animation to the surrounding streets.

Members were informed that Officers considered the architectural design of the building would be compatible with the existing context in terms of its scale and massing, and it would be read as a well-layered piece of design which would improve the building's contribution to the local townscape. The proposals would enhance the overall quality and character of the ground floors, which would be transformed to be outward-facing and visually permeable, encouraging a positive interaction with surrounding streets, as well as making the entrances to the buildings much more prominent and inclusive.

Members were shown a number of townscape views and were advised that Officers had assessed the impacts of the proposal on surrounding designated and non-designated heritage assets, including the Barbican as a Listed Building Conservation Area and registered Historic Park and Garden and concluded on all accounts the proposal would preserve the setting and significance of all. Furthermore, no objection was raised by Historic England or any other relevant heritage bodies.

In relation to the assessment conclusions, the Officer stated that the loss of office had been demonstrated to be acceptable and the site was considered suitable for a co-living, residential development. The quality of accommodation and communal facilities to be provided was considered acceptable and would contribute to the City's annual housing targets equivalent to 97 conventional

housing units and increased housing choice for City workers and Londoners generally, whilst £8,510,000 would be secured towards offsite affordable housing. The proposal was for the major refurbishment of the existing building, with extensions to upper floors, 90% of the substructure, 66% of the superstructure and 0% of the facades would be retained. Although the proposal would result in the highest life cycle carbon emissions out of the presented options, this option would be able to deliver the holistic sustainability benefits that would complement the redevelopment of the site in its context. Sustainability Officers were satisfied the proposal would deliver a high quality, energy efficient development which was on track to achieve an excellent BREEAM assessment rating. Officers considered the architectural design of the building would be compatible with the existing context in terms of scale and massing, and would be read as a well-laid piece of design, improving the building's contribution to the overall townscape. The proposal would enhance the overall quality and character of the ground floors and the building entrances would become much more prominent and inclusive.

Officers had assessed the impact of the proposal on surrounding heritage assets and the proposal would preserve the setting and significance of these. Officers had also considered the amenity impacts to be acceptable when considered on balance with other merits of the application. Other than the proposed accessible parking space, the development would be car-free. It had been assessed to have less highway activity than the existing use and this was subject to compliance with conditions and planning obligations, which were recommended, including the submission of a demolition and construction logistics plan, delivery and servicing plan and the parking design and management plan. A travel plan was also recommended to be secured by Section 106 agreement and a Section 278 agreement was recommended to secure the cost of public highway and public realm improvements which were required.

The Officer summarised stating the proposal would make the best use of land following a design-led approach which optimised the site's capacity to accommodate co-living housing, which would increase the housing stock and choice for Londoners, and the proposals aligned with the functions of the City to accommodate substantial growth. Officers considered the proposal complied with the development plan when considered as a whole. Officers recommended that planning permission should be granted as set out in the recommendation in the Officer report. Members were shown slides highlighting the CIL and Planning Obligations and Heads of Terms.

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

Ms Joanna Boait, stated she was speaking on behalf of the Ben Johnson House Group Committee and the House Group members. She stated that whilst accepting that additional residences were necessary for the City, Ben Johnson House would be significantly adversely affected by the proposals for 45 Beech Street. The proposed added height would impact the daylight and sunlight that reached some of the flats. The Planning Officers had assessed the

impacts to be acceptable but had only assessed ten windows and had suggested that most of the impacted windows were bedrooms. Ms Boait stated that approximately half of the windows impacted a part of the daily living space of these flats, and for most flats the only other window was over 12 metres away on the south side of the building. The 34 additional windows in the upper floors meant that the residents of 45 Beech Street, especially at the north end, abutting Bridgewater House, would be able to see into rooms belonging to Ben Johnson House residents on the northern and western sides. She stated this was a significant invasion of privacy and given the impact on daylight and sunlight, she asked that the roof line be lowered or the upper floor set back.

Ms Boait stated it was understood the operational management plan would be refined and subject to a Section 106 agreement to secure the contents as obligations. She added that there were to be 174 residential rooms and point 116 of the Officer report stated that none of the rooms were considered large enough for occupation by couples. The operational management plan should therefore include the obligation that each room should be lived in by one person. In addition, and in accordance with the London Plan and the Officer response, the operational management plan should include the obligation that tenancies should be for a minimum of three months. The operational management plan would be key to ensuring that the occupants of 45 Beech Street could be welcomed. It would be very helpful if representatives of the residents closest to the development were given the opportunity to be actively involved in the development of the operational management plan.

Ms Boait stated that with 79 rooms with openable windows overlooking Ben Johnson House, the potential for disturbance from music, general noise, smoking and other smells was significant. She requested that the proposed compliance condition requiring the limiting of live and recorded music so that it could not be heard outside the premises, be extended to include all noise, as was the case across the Barbican. She added this should also cover the roof terrace at ninth floor level, which currently referred only to amplified or other music. Ms Boait stated there appeared to be no designated smoking areas and stated that suitable conditions should be included in the operational management plan.

Ms Boait drew Members' attention to the planning conditioning allowing the ninth-floor terrace to be used only between 7:00am and 10:00pm and stated this was both too early and too late for a residential area and the hours should be limited to between 9:00am and 6:00pm. She added that 6:00pm was the planning condition time limit for the roof terraces at 1 Golden Lane. She also stated that a servicing and delivery start time of 7:00am was too early and stated that this should match other sites in this residential area where deliveries, including the shops such as Waitrose, had delivery and servicing times restricted to 8:00am - 9:00pm and there should be no deliveries at weekends. Ms Boait stated that in addition, no delivery, servicing or waste disposal vehicle serving 45 Beech Street should be permitted to reverse in Bridgewater Street. She added that suitable conditions for delivery and servicing should be included in the operational plan. She also raised concern that rubbish would have to be brought up from the basement to the top of the

ramp and then along the pavement. She asked that the waste disposal plan be reconsidered and secured by a planning condition and gave an example of 1 Golden Lane, where waste was taken from inside the building directly to the waiting rubbish vehicle.

Mr Alexander Wilson, Chair of the Shakespeare Tower House Group, stated he was speaking on behalf of Shakespeare Towers. He stated that Shakespeare Towers, whilst further away from the work than Ben Johnson House, was still about 50 metres away from the site at 45 Beech Street. He stated that it would be preferred if the terrace was not included, but if it was to be included, that a 6:00pm restriction be added.

Mr Wilson raised concern about live music events on the ground floor and concern noise would reverberate off all the other buildings and hit Shakespeare Tower. He requested that these events be prevented from taking place or if they were to take place, triple glazing be installed and no windows ever be open during such performances.

Mr Wilson raised concern about noise during construction. He informed Members that noise from 1 Golden Lane had been an issue and Ben Johnson House was in between the two buildings. There would be no building in between this development and Shakespeare House. He requested that the developers acknowledge this and work with the residents to see how the noise could be minimised during the summer when windows were opened.

Mr Fred Rodgers, Barbican resident stated that paragraph 116 of the Officer report referred to only one tenant being regulated under Section 106 and this should be changed to one occupant to ensure that only one person occupied any unit at any time. He raised concern about the additional embodied carbon in the proposed architecture at roof level with the amount not being specified and raised concern that if subjected to a design review panel, the panel would also have had concerns.

The Deputy Chairman, in the Chair, asked if Members of the Sub-Committee had any questions of the objectors. A Member queried if there were noise concerns regarding the terraces on the eighth-floor units as they faced Shakespeare Tower. An objector stated this was the case, although to a lesser extent than the specific noise concerns raised, due to the different demographics of those living in the units. There were family units in Ben Johnson House, but there would not be in the proposal, and the occupants would have a different style of living, with younger residents and more potential noise.

A Member stated that the normal standard for music licences and applications throughout the City was that they should finish around 11:00pm. He asked the objectors why they considered an exception should be made in this case. An objector stated that most people arrived home from work at about 6:00pm and it was reasonable for them to have peace and quiet from that time.

A Member asked for clarification on an objector's concern that the proposal would draw young people. An objector stated that the proposal would add 300 people to a small area that was next to a building with only 400 people. It would add to noise and smells e.g. from smoking and from kitchen extractors. Another objector stated there was no issue with young people or students and many students lived in the Barbican. He added the concern was the destruction of the Barbican being advanced in this scheme and that it was unfortunate that the affordable housing contribution was in cash rather than in flats within the development.

A Member asked objectors to outline the consultation process. An objector stated that some documents had been received through letterboxes and the Barbican Association was consulted but the registered Tenants Associations of the housing blocks were not approached. Residents had had to read notices displayed on site, many of which were put up after the closing date for comments.

A Member asked about the impact the construction of 1 Golden Lane had on the wellbeing of those living nearby. An objector stated complaints had been made. The Deputy Chairman stated that this was not relevant to the application under consideration and that each application should be considered on its own merits. The Member stated that there should be a clear obligation for the developer to take adequate steps to put protection in place and explore minimising noise disruption during the demolition and development e.g. through regular site meetings. The Deputy Chairman stated that Officers could be asked about steps to minimise disruption, later in the meeting.

A Member asked about the significant change in the pattern of deliveries and the impact on local deliveries. An objector stated Viscount Street was currently one-way from the south, Brackley Street had been closed by the construction of 1 Golden Lane and traffic was being diverted the wrong way down a one-way street without marshalling. He added this should be addressed before work started on 45 Beech Street.

The Member also asked about the arches at the top of the building. An objector stated that this could look better if it was coloured orange, but he raised concern about trying to imitate a work by renowned architects for no particular reason and increasing the embodied carbon when a flat roof and wooden structure could be used.

A Member asked about the usage of the podium by the public. He stated that the usage of the podium was one tenth that of most other public realms and yet was the most expensive. Another £17m of on street parking reserves would be spent. The Member asked for clarification on objector concerns about additional public, including the potential residents of this development, using the podium. Ms Boait stated that whilst the podium was a public walkway, it was also the road outside homes. It was proposed to have more seating which would be under residents' windows, and there would be more people in the space near homes. Concern was raised about a potential increase in noise and smoking and there being currently no policing of the area to ensure no anti-social

behaviour was taking place. Ms Boait stated that Ben Johnson House usually had the highest number of anti-social behaviour complaints of the whole estate. Mr Rodgers stated the podium should be used more and disagreed that it should be a private area for Barbican residents.

A Member asked about the consultation process and the delay in the finalised documents being presented. Ms Boait stated that some of the documents were uploaded on 31 August 2024 and there was no index. Mr Rodgers stated the initial consultation was very good. He stated that although listened to, residents did not consider they were heard.

The Deputy Chairman invited the applicant to speak.

Mr Damien Sharkey, Managing Director of Hub stated that Hub along with their partner Bridges Fund Management, were the applicants for 45 Beech Street. Mr Sharkey advised that Hub was one of the UK's leading living developers with over 7,000 homes completed or under development across the UK. At 45 Beech Street, Hub had partnered with Bridges Fund Management, the UK's largest social and environmental impact investor. Hub and Bridges had a 10-year development partnership with all their developments demonstrating positive social environmental impact and leaving a lasting legacy.

The vision for 45 Beech Street included retrofit an existing building and maximising reuse of the existing structure, providing new living accommodation for City workers, producing a high-quality design, providing enhancements to the Beech Street frontage and delivering a car-free development. Members were informed the existing building was no longer fit for purpose as a modern office building and no longer able to compete with other serviced offices providers in the local area, of which there were 29 within 1/2 mile radius. This is because the internal layout was severely compromised. Access around the building did not achieve the inclusivity requirements expected of any modern office building. The office floors had reduced floor to ceiling heights and internal layout was very compromised, not DDA compliant, and did not comply with the latest building regulations. Over the past 12 months, the applicants had engaged in an extensive collaborative design process. They had held a number of consultation sessions with key stakeholders, residents and local resident groups. They had sent out over 2,000 invitations to all households and businesses in the local area and held two public exhibitions on the proposals. These events were attended by 69 people and the applicants had found the feedback extremely helpful, allowing them to consider and incorporate several items into the final proposals. At the consultation events, the applicants had heard the concerns that some local residents had regarding both operational noise from future tenants and also construction noise. Mr Sharkey stated the building would be professionally managed by an on-site team who would be both contactable and present every day. All the external amenity spaces would be closed from 9:00pm until 7:00am and these hours were reduced from those currently set out in the draft conditions. There would be no amplified music in this building at any time. Mr Sharkey stated he understood that construction noise could be frustrating and disturbing and added that given that the majority of the existing structure was being retained, the noise and dusty works were

minimised in comparison to new buildings. However, in order to minimise disruption further the applicants would use one of their trusted contracting partners and hold monthly meetings with all local residents invited to keep them updated and address any concerns.

Mr Sharkey spoke about co-living as a use. He stated that 45 Beech Street was located in the middle of the City of London's largest residential neighbourhood. The strategy allowed it to be changed to a residential use which was more in keeping with the surrounding area and community and the City of London. He stated there was a genuine demand for this type of housing. It provides an opportunity for those who worked in the City to live close to where they worked and enjoy all the benefits of the City and in the last 12 months alone, Knight Frank City officers had had over 1,000 inquiries from City businesses. This type of accommodation was more affordable than traditional built to rent or HMO. Co-living rents averaged 7% lower than traditional private rented homes and 14% average discount to multifamily build to rent. Based on recent research from Knight Frank, 72% of co-living residents in the UK were aged between 26 and 40 years old. In terms of building management, the building would be professionally managed by an on-site team. A detailed management plan would be submitted to the City for approval which would cover details of how the building would be managed. Tenants would be required to respect the local community and abide by the rules of their tenancy agreements. The team on-site would ensure that there would be no nuisance to the neighbouring residents and would be contactable at all times to address any concerns or complaints. Mr Sharkey informed Members that there were a large number of benefits to this application. The construction of 174 new homes would contribute to the City housing targets; a fully policy compliant affordable housing contribution of £8.5 million would be made; through the lettings plans, City businesses and organisations would have access to the three month exclusivity sign-up to the co-living homes; the existing building would be given a much needed revival; the public realm would be improved; the ground floor amenity spaces would be open up to the public; and the scheme would provide a sustainable car-free residential development.

A Member asked the applicant if the refuse collection plan would be reconsidered given the objector's concern and if the servicing hours would be reduced. Mr Sharkey stated that the developers wanted to build relationships with nearby residents and were happy to review the detail. He added that the number of trips the scheme would generate was much lower than the existing buildings but the applicants were willing to consider future potential changes.

A Member welcomed the willingness of the applicant to work with residents but stated there were lots of issues around noise and construction and asked for a document to be produced on resident engagement. Mr Sharkey stated that typically, if a scheme had consent granted, the applicant would advance the design alongside one of their preferred contracting partners, who would have experience in this type of construction and would develop a strategy bearing in mind the context they were working within, and this would be presented to all neighbouring groups. Before work started on the site, there would be meetings, and concerns would be addressed. A monthly newsletter was then issued

which covered any work that had taken place in the previous month and a look ahead to the following month. There would also be in-person meetings, with the developers attending. The design would be developed bearing in mind there were elements of prefabrication or off-site construction which would be maximised given the sensitive location.

In terms of the amenities given, a Member asked why when there was the podium and the site was near the Barbican theatres and cinemas, there was a roof terrace proposed and not an extension of the green roof. Mr Sharkey stated the applicants wanted to provide some external amenity. The space had been minimised as much as possible to about one square metre per resident in view of the other amenities in the area.

A Member commented that there had been complaints from current residents in Bridgewater Street about noise from the collection of refuse and she asked if there were quieter systems than the one proposed. Mr Sharkey stated the applicants would review the bin strategy.

The Member welcomed the 17 units for people with disabilities, but was concerned that there was only one proposed parking space for those 17 units. Mr Sharkey stated that the applicants were proud to be delivering 17 fully DDA compliant homes, there was a DDA compliant WC on the ground floor and cycle storage would also be DDA compliant. The applicant typically liked to deliver car-free developments for the social impact benefits and therefore minimised car park spaces and encouraged sustainable means of transport, particularly in a location such as this where public transport was good. However, they fully acknowledged that they did need to provide car parking and so were delivering one space. This would be very carefully managed to make sure that it was provided for the tenants that needed it.

The Member questioned the proposal for building work and HGV access on Saturdays and whether this was reasonable in such a built-up residential area. Mr Sharkey stated the applicant always signed-up to local authority restrictions. It was acknowledged that Saturday was a day that people tended to be in their homes longer so this could be discussed with residents but an element of working on a Saturday was important. Restricting working hours would increase the overall duration of the construction programme. The applicants were willing to work with neighbours to ensure that Saturday disruption was minimised.

A Member suggested that a respite centre be set up for residents to use during noisy working hours. She also queried why there was no affordable housing on site. Mr Sharkey stated that a fully policy compliant affordable housing payment was being made and it was decided at an early stage with Officers that this was the appropriate route forward.

The Member asked how single occupancy would be enforced and whether there should be units couples could rent. The applicant stated that there were single occupancy, tenancy agreements. It was recognised that people would have friends and partners, however all units would have single occupancy tenancy agreements. Where an occupant met a partner and had them stay in

their unit, they would not immediately be asked to end their tenancy but the building would be carefully managed and there would be robust tenancy agreements. Co-living was about providing people with a home and on an all-inclusive basis, giving them flexibility and giving them somewhere close to work to live and was not trying to define how occupants lived their lives.

A Member queried why the applicant had not sacrificed one of the rooms on the podium level and joined up to the podium opposite the T-intersection of the corridors, as this would have given natural light into both of the corridors, which were now entirely artificially lit. This would have also meant there could be fresh air in the corridors, and all the users of the building would have direct access to the podium. The applicant stated that it was not possible to open up the private amenity due to the fire strategy. Also, there were security reasons for the proposed layout. The private amenity space was located where it would minimise the disruption to neighbouring buildings.

A Member asked what discussions would take place with St Bartholemew's Hospital and schools and City of London Police in terms of their needs and how they could be accommodated given the nature of the market rent. The applicant stated that as they moved towards delivery and the occupation phase, they would work to establish local organisation needs and wants. Occupants coming from key worker organisations would be prioritised. A list of those who worked in the City who would be eligible for three-month exclusivity would be proposed to the City for approval. Those parties, businesses and people on this list would also be notified of upcoming vacancies.

The Member asked why an emergency diesel generators was proposed and whether a battery solution could be more sustainable. The applicant stated that current building regulations did not permit electric and battery power generators. It was hoped that by the time the scheme was delivered, the regulations would have changed.

The Member asked whether the applicant would consider installing a Changing Spaces toilet. The applicant stated that the threshold was 100,000 square metres which was significantly larger than the development. However, the applicant was delivering 17 accessible units, the disabled car parking space and an accessible WC on the ground floor.

The Member asked about the impact of deliveries to 1 Golden Lane and 45 Beech Street in modelling work. The applicant stated the building was professionally managed with a 24 hour/7day a week concierge, so delivery drivers could give the delivery to the concierge and then leave, rather than wait for the occupier to arrive at the ground floor.

The Member stated that in the London Plan, there was a requirement for space for an armchair and two-person settee in large-scale, purpose-built, shared-living spaces. He asked how this might be accommodated given the size of the rooms. The applicant stated that all their homes were fully compliant with the London Plan and accommodated the furniture that was required. All the homes had been tested by architects to ensure they fully complied.

A Member asked for clarification and reassurance on the fire safety elements of the proposal. Mr Sharkey stated that the core had been reconfigured to put in two staircases and another firefighting lift had been included in compliance with the latest building regulations. This was a gateway project so the scheme had been submitted for Gateway 1. If planning consent was granted, a Gateway 2 application would be submitted to the Health and Safety Executive for approval before any works were started. Prior to occupation, Gateway 3 approval would be obtained. This building had been designed to comply with the latest building regulations and recommendations.

A Member asked for clarification on whether amplified music would be played at events in the communal area. Mr Sharkey stated that amplified music would not be played in the buildings and the ground floor space was a peaceful space for tenants. The only events held there would be resident meetings.

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

He asked Officers to comment on an objector's suggestion that the arches were too large, were a waste of carbon and a flat roof would be better. The Director of Planning & Development stated that Officers considered the design of the arches was contextual in the context of the Barbican, which was a listed building. They were noticeably different and smaller than the Barbican arches so the integrity of the estate and its listed status would not be challenged as a result of them. An Officer stated that the embodied carbon associated with the roof over the building life cycle would amount to approximately 1.5% of the overall embodied carbon associated with the whole development, and Officers were satisfied that that would contribute to the overall sustainability of the scheme. Officers considered this was an important architectural flourish at the top of the building. There were also problems with flat roofs such as pooling of water and leakage. The Director of Planning & Development stated that a building of this nature, given the context, would be expected to have a flourish at the top to give it a visual determination and he considered this an accomplished response to that challenge.

The Deputy Chairman stated the proposed images and plans suggested the telecommunications equipment on the top of the roof would be removed. He asked whether new equipment would be permitted to be installed afterwards. An Officer confirmed that it would be removed and any future proposal for telecommunications equipment would have to go through the normal statutory approval process including consultation and planning.

A Member asked Officers to comment on an objector's point that Officers had found the loss of light to be within acceptable levels, although they considered that Officers had not taken all of the sites and all the rooms into account. An Officer stated the applicant had submitted a daylight and sunlight assessment and the results were fully outlined in the report. He added the assessment had been independently reviewed by the BRE, who had confirmed the

methodologies of the report to be acceptable and in line with the guidance. Overall, Officers considered the loss of light to be acceptable.

A Member asked if the servicing hours could be amended to 8:00am-7:00pm. An Officer stated that the delivery and servicing hours were restricted to avoid peak hours of 7:00am to 10:00am, 12:00pm to 2:00pm and 4:00pm to 7:00pm. The existing building did not have any restrictions, so this would be an improvement. There was a condition attached to the proposal and Officers would receive further details to approve at a later stage. The Member stated that she considered that the servicing hours should be amended to 8:00am-7:00pm.

MOTION: A Member proposed that the servicing hours be amended to 8:00am-7:00pm. This was seconded.

Members proceeded to vote on the motion and the motion was carried.

A Member spoke in support of the development and stated architecturally it was an improvement and it was a highly positive scheme which welcomed people including young people. He questioned the different cut off times for terraces on 1 Golden Lane which was an office building and 45 Beech Street which was a residential building. The Officer stated that 6:00pm was the cut off for 1 Golden Lane which was an office building but this would not be reasonable for 45 Beech Street which was residential.

A Member asked Officers to comment on the proposed demolition, work and HGV access on Saturday mornings in a residential area. An Officer stated that Saturday working was permitted under the existing City of London code and a large piece of work was undertaken in 2017/18 looking at what controls the City of London could choose to apply. This led to a later starting time for Saturday works so they were now permitted from 9:00am until 2:00pm rather than the industry standard of 8:00am-1:00pm. Some sites utilised Saturday working and others did not. There was always a balance to strike between the hours of work and how long the job took, cost and minimising disturbance. HGVs could be brought to site earlier than work start times but could not be used before 8:00am on weekdays or before 9:00am on Saturdays.

The Member also asked about whether the Design Out Crime Officer had been consulted. An Officer stated there was no indication in the submission that this was a high-risk use, but the Section 106 would require a management plan to be agreed in consultation with the police. There would also be 24-hour concierge and security access throughout the building.

A Member asked for the Officer view on how this scheme would help meet the needs of key workers. An Officer stated this was a rare type of offer coming before Committee. It was governed by the London Plan which defined co-living. The proposal provided an off-site contribution towards affordable housing of £8.5million. The Officer stated that the bedroom units did not meet the GLA definition of dwellings. They were therefore not flats but bedrooms with shared communal amenities, and that was within the definition of London Plan Policy

H16, and its associated guidance. As such, the GLA were very clear that this product was not suitable for affordable housing or to be considered affordable housing and in lieu payment back into the development at lower rents of a small number of the rooms would not accord with this policy, would not result in affordable housing on the site and as such would not be considered acceptable in planning or housing terms.

The guidance on this product that had been published and adopted was also clear. The provision of below market rental units within the development was not an acceptable alternative to such an off-site financial contribution and the co-living units did not meet the London Plan internal space standards to be considered C3 housing and as such, they were a sui generis product. The London Plan was unequivocal that co-living must provide a cash contribution towards conventional C3 affordable housing, of which the Corporation already had the mechanism to deliver. As it was not housing class C3 it was not an affordable housing solution and was therefore not considered key worker provision. There would be a City worker marketing scheme that would be provided, which Officers would negotiate with the applicant and that might well include St Bartholemew's Hospital.

The policy required that the private units were not to be considered or able to become self-contained homes and should not be able to be converted to such in future, but did provide functional living space. They therefore did not have separate external accesses and they had shared internal areas. The product itself was part of an approach to deliver short term housing solutions as part of the wider housing solution. The intention was that people would take these on relatively short-term agreements and then would move on through the housing market.

A Member asked what steps were being taken to ensure that the residents all around Barbican continued to be able to enjoy the present level of utility once the telecommunications equipment was removed. An Officer stated that this would normally be considered to be a market-led solution and through the demolition of the products in the existing building, the developer would need to engage with the equipment operator and the mast companies, and would come to planning for suitable relocations of that. A Member suggested that discussions should be proactively undertaken with the telecommunications providers before masts were removed. Officers stated they would work with the developer on this.

A Member asked how long occupiers would be expected to live in the units. An Officer stated there were a number of these co-living developments around the country and within London. The minimum tenancy was three months to prevent a constant turnover. There was no maximum prescription for occupation although most people tended to stay for a year or two. The housing approach was similar to a multiple occupancy home but with greater provision for communal facilities e.g. gym and retail which were prescribed within the guidance as being encouraged and the amenity space was a requirement also. The applicant had delivered on these aspirations.

The Member asked that the Officer who specialised in suicide prevention be consulted on the design of the roof terrace. The Officer stated there was a condition in relation to suicide prevention but the wording of this would be made more explicit.

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

The Deputy Chairman stated that he considered that the proposal provided much needed high-quality private rented co-living accommodation. There was an acute shortage in London, exacerbated by private landlords leaving the sector. The proposed development had a high degree of material reuse and low operational energy use through the extensive use of modern technology and solar panels.

It would be connected to the district heating network and the building's energy performance would be further enhanced when the district heating network was further decarbonised. There was a significant £8.5 million contribution to affordable housing. The development would put a stranded asset on a valuable but difficult site back into productive use. The Deputy Chairman considered that the modified building's appearance was aesthetically superior to the existing building and the design sensitively acknowledged the Barbican Estate while maintaining a clear differentiation with the surrounding Barbican blocks.

A Member spoke in support of the scheme and highlighted the difficulties in undertaking an office to residential conversion. He stated this was a successful example and he congratulated the architect on making the scheme work.

A Member raised concern about construction noise, traffic, and the impact on people's mental health. She stated the developer should be required to work with residents and ward councillors.

A Member asked Officers how the developer working with residents, could be embedded in terms of managing the construction phase and having a respite area. An Officer stated the code was detailed in terms of expectations of developers and contractors and liaison with residents. Officers were acutely aware of the sensitivity of the site due to the significant number of residents that would be impacted by the works and Officers would be encouraging developers to start discussions. The Member stated she would encourage the use of non-percussive piling to deconstruct the concrete and requested that sound and vibration monitors be used.

A Member raised concerns about noise from 1 Golden Lane and acoustic shielding there not having been delivered. He stated developers should be held to account ensure points raised by residents were taken into account e.g. in relation to noise and delivery management. He added the impact of this development would significantly affect the lives of the residents over the next 18 months to two years and work should take place with them to ensure it was minimised.

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

A Member stated that no plan would ever be perfect and when a building was being repurposed, compromises would have to be made. He considered the compromises made were fair and generally speaking the scheme met objectives. He understood the construction concerns and stated that in his ward, close work had taken place with developers to minimise disruption and he anticipated this would happen with this application as there had been commitment from all parties to make this happen. He could not see a regulatory reason to reject the application.

Seeing no further questions the Deputy Chairman moved to the vote.

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

Votes were cast as follows: IN FAVOUR – 11 votes
OPPOSED – 0 votes
There were 2 abstentions.

The recommendations were therefore carried.

RESOLVED -

(1) That subject to the execution of the planning obligations in respect of the matters set out under the heading 'Planning Obligations', and the recommended conditions of development, the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule with any relevant amendments set out in the addenda and the motion outlined above; and:

(2) That 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.

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

The Sub-Committee considered a report of the Planning and Development Director concerning the retrospective application for removal of three fume cupboard discharge flues and installation of three new extract flues to existing roof plant enclosure.

The Deputy Chairman, in the Chair, reminded Members that the fact that this was a retrospective application should not be part of the considerations and that the application should be taken on its own merits.

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

Officers presented the application highlighting the site in context with the listed Barbican Estate, which was Grade 2 listed, and the site within the Barbican Estate and Golden Lane Conservation Area. Members were also shown the site in the context of where the school sat within the estate and also its proximity to Saint Giles Cripplegate Church, which was a Grade 1 listed building.

Members were shown the site plan for the school and were informed that the proposal lay on the elevation of a plant enclosure on the western side of the main school building. They were shown images of the rooftop plant enclosure on the western side of the main school building, with the images being taken prior to the works which were then carried out to install flues. Members were shown images of the flues, comprising one horizontal flue and two vertical flues.

The Officer showed an image of the plant room prior to the amended flue installation which demonstrated the constrained and unsafe ladder access which was heavily compromised by the position of flues. Members were informed that the extract flue relocation was to accommodate a safe ladder access and they were shown images of the relocated flues and the new, safer compliant ladder access in the plant room. Members were also shown images of the flues prior to the amendment how they would appear afterwards.

Members were shown a view of the flues from Defoe House where they sat minimally as three grey marks, a view from Seddon House where they were minimally visible but partially obscured by trees and a view from Thomas More House demonstrating the flues were not visible from this location. Members were also shown a view from the Barbican Arts Centre, which was likely to be one of the views where the flues were the most visible, a view from the adjacent highwalk where they were minimally visible and two views from Wallside where they were not visible.

The Officer stated that the flues themselves were not the subject of a planning application when they were installed, and that was why they were being dealt with as a retrospective application. During the course of the application, Officers treated them as they would any other application and they explored the constraints and the design requirements for the flues to arrive at a solution which would alleviate objectors' concerns. A meeting was also held with two objecting residents and the Barbican Association early on in this process. To see the concerns objectors had with this installation, Members were shown an image of the solution that was found, which was a reduction of the flues from their originally installed height of 1.3 metres down to 700 millimetres, a reduction of 600 millimetres in total. This brought them below the roof slope and significantly reduced their visibility and made them appear as a more natural and normal form of utilitarian roof servicing.

The Officer stated that the materials of the flues were subject to condition. They would be submitted to Officers for review to make sure that they were visually congruent with the roof enclosure behind them. Members were informed that the reduction in height would not lead to any reduction in air quality or any reduction in the dispersal qualities of the original flues. The intake behind this installation would be infilled so that there was no spilling back into the plant enclosure and given that the flues served an internal science cupboard, they were not the same as flues which might serve plant machinery that ran all day. They ran when necessary to extract a fume cupboard from a science classroom.

Members were shown a comparison image which showed the flues now and how they would appear in the future. It was considered that they, as amended, would have a neutral impact on the heritage assets outlined and that they would have an acceptable impact on residential amenity. As such, Officers recommended this for approval.

There were no objectors registered to speak. The Deputy Chairman invited the applicant to speak.

Mr John Hall stated he was Chief Operating Officer at the City Schools, covering the Junior School, Girls' School and Boys' School who were not the building owners. They were the occupiers and such projects were run for them by City Surveyors. They were however, the project funder. It was the parents' fees that were invested in the 20-year programme of renewal and there was a commitment to the upkeep of the Barbican estate, extending the lifespan of the school building there and the associated infrastructure as well. Mr Hall stated he was unable to comment in a technical capacity, but he understood during the course of the project that these were essential alterations in order to be compliant so that the school could have new fuel cabinets, to update the science teaching facilities. They learned about this late in the process and regretted that this ended up being a retrospective application.

A Member asked for reassurance from the school that there would be a more strategic engagement plan with local residents going forward. Mr Hall assured the Member that this would be the case and stated he met with the chairs of the residents' committees regularly every term and they talked in broad terms about the schools plans e.g. the science refurbishment. He stated there had been a gap in terms of this design detail which the school did not have sight of at the time. They had discussed with City Surveyors that in terms of the detailed engagement the school needed more information and there needed to be more proactive engagement with residents. Mr Hall stated he was meeting with the Planning Department to agree a regular forum through which issues could be raised as sometimes the works at the school were fragmented between different parties, and different parts of City Surveyors. Mr Hall stated he had also met with the chair of the resident association's planning committee to discuss improvements going forward.

Seeing no further questions the Deputy Chairman moved to the vote.

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

Votes were cast as follows: IN FAVOUR – 10 votes
OPPOSED – 0 votes
There were 0 abstentions.

The recommendations were therefore carried unanimously.

[Deputy John Fletcher, Deputy Edward Lord and Amy Horscroft were not in attendance for this item and therefore did not vote.]

RESOLVED -

That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule with any relevant amendments in the addendum.

6. * VALID PLANNING APPLICATIONS RECEIVED BY THE ENVIRONMENT DEPARTMENT

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

RESOLVED – That the report be noted.

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

A Member raised concern about the number of retrospective applications from the City of London School for Girls and stated they had recently installed CCTV, a camera keypad and cabling plus a permanent shelter for security guards. She asked if it was acceptable for this amount of work to be undertaken without planning permission, in particular when it impacted on the listed status of the Barbican Estate. She also raised concern that there seemed to be a lack of active involvement with residents.

An Officer stated that a retrospective planning application was not the preferred approach. To try and prevent it from happening again, there was an agreement in principle for there to be a quarterly meeting with Planning Officers, City Surveyors and the City of London Girls School to discuss the programme of works being undertaken. In relation to the other works outlined, Officers would be visiting the site in the immediate future. The Director of Planning and

Development stated he would raise the matter with the City Surveyor after the meeting. The Deputy Chairman stated the situation was unacceptable and there needed to be clarity on where the responsibility lay, to ensure it did not happen again. He added that whilst a solution had been found, it had caused unnecessary expense, delay and work.

A Member stated that this was a constant source of frustration with people undertaking work on the estate without regard for the list of building guidelines for the Barbican Estate. He stated the need for those working on the estate to be made aware of these guidelines. The Director of Planning and Development stated he would outline the points raised by Members, and provide a link to the debate, to the City Surveyor and state the need for discipline and proper procedure to be followed.

The Director added that instances of unauthorised works within the Barbican Estate were not particularly widespread but Officers would keep monitoring this to ensure there was not any slippage.

A Member asked for clarification on the process of reconsulting when there were amendments. The Director of Planning and Development stated in terms of amendments to applications, it depended on the nature of the amendments. If they were very insignificant there would not be a whole new round of consultation. The onus was on both parties and the developer was expected to engage with the community as set out in the advice. If amendments were significant, there would be another statutory consultation period which could be up to 30 days and again the onus was on both parties.

A Member stated it would be helpful to know which applications were likely to be considered at each meeting to help inform the public so those with an interest had plenty of notice and could schedule in time to attend the relevant meeting. Members could also start work and look at documents online.

The Member raised concern about the meeting scheduled for 17 December being the only committee meeting scheduled in that week. She stated diaries would be busy with Christmas events and some people could be away. She suggested that the meeting be moved to earlier in December or early January. The Director of Planning and Development stated that there was a vigorous pipeline of schemes with several towers coming up and therefore 17 December meeting was likely to be required. As a matter of good practice, Planning Applications Sub-Committee meetings were not held straight after the Christmas break as notification letters were sent out prior to the meetings. During the Christmas period, people were less likely to be home to get forewarning that an application was going to the Sub-Committee and this could lead to criticism. The Deputy Chairman stated there would also be a gap in meetings over the election period in the Spring 2025 which meant there was pressure to get applications considered before then. A Member stated that he considered before Christmas as preferable to just after the Christmas break as Members would be able to read all the material before rather than during the break.

A Member raised concern about the reputational risk of holding meetings in holiday times. He stated the 8 October meeting had been rescheduled to 29 October as the Chairman and Deputy Chairman were unavailable. He stated that as 29 October meeting was in half term there would be similar issues with people being unavailable to attend. He suggested that this date be reconsidered and that Committee members be given the reason when meetings were being rescheduled.

The Deputy Chairman stated he would inform the Chairman of the points made by Members in relation to the meeting dates.

9. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

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

The meeting ended at 1.00 pm

Chairman

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

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| Committee: | Date: |
| Planning Applications Sub Committee | 29 October 2024 |
| <p>Subject:</p> <p>Tenter House, 45 Moorfields, London, EC2Y 9AE.</p> <p>Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].</p> <p>Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ</p> | Public |
| Ward: Coleman Street | For Decision |
| Registered No: 24/00209/FULMAJ | Registered on: 26 March 2024 |
| Conservation Area: N/A | Listed Building: N/A |

Summary

The proposals include the erection of a part 14, part 21-storey building primarily for office (Class E(g)(i)) use, with one ground floor retail unit (Class E(a/b)), and a community space (Class F2(b) at ground floor level, as well as significant landscaping works to City Point Plaza and reconstruction of New Union Street as a pedestrian priority thoroughfare. The proposed development includes the demolition of all remaining elements of the Site following demolition of the 11-

storey Tenter House as part of planning permission previously granted under reference 17/01050/FULMAJ, which has been lawfully implemented. This additional demolition includes the Class E unit and its associated structures which sits at the junction with City Point to the west of the Site, the ground and basement floor slabs of the Site including the car park access ramp, which is accessed at present from Moorfields.

The scheme would deliver a high quality, office-led development that would provide 33,758sq.m of flexible office floorspace, which meets growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. The scheme makes optimal use of the site and provides an uplift of approximately 7534 sq.m (GIA) of office floorspace over and above the consented scheme and 17,958 sq.m (GIA) of office floorspace over the pre-existing 11-storey Tenter House. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorplates with access to balconies and terraces for all office tenants to promote wellbeing.

The retail unit at ground floor would help contribute to vibrancy across the ground plane and link to the nearby Principal Shopping Centre at Moorgate. The proposed community space at ground floor level would contribute to the aims of the draft City Plan 2040 of creating a healthy and inclusive City, in particular policy S1 which seeks to provide new community facilities. Details of the operation and management of the community space are required through S106 obligation to ensure that the space would meet community needs whilst not harming the amenity of nearby residential occupiers. The retail space and community and cultural offer would enliven the area around the site and would contribute towards the Destination City agenda.

The building would rise to +95.25m AOD at its highest point, and +71.55m AOD to the top of the lower volume balustrade. The proposals would positively transform the plaza and reconnect the site into the surrounding urban realm. The proposed building, through its ordered façade design which fosters a sense of harmony with the neighbouring buildings, would bring together the various contemporary architectural treatments which surround the plaza whilst also dramatically improving the sense of an active, green, and fully inclusive public realm close to this important transport hub. The bulk, height, massing and quality of materials and design approach would be appropriate to the character of this part of the City, whilst adopting a soft green articulation appropriate to the future ambitions of the City, which is considered an improvement over the outdated character of the consented scheme.

The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure and able to support active travel and maintain pedestrian comfort for a high number of future employees. This quantity of

floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.

The proposals substantively and substantially improve the public realm through the releveling of the plaza and expanding the extent of its continuous accessible surface. This is a significant enhancement to the civic quality of the plaza, an important public open space. The removal of the vehicle access ramp on entry to the plaza from Moorfields would create a welcoming point of transition and improve wayfinding along on this key east-west route through the city. Moreover, the proposed landscaping and greening of the facades provide a moment of relief in the surroundings. Improvements to New Union Street reflect the prioritisation of pedestrian movement, as well as opportunities for public art, and provide an improvement in the activation at street level, which is continued around the site as a whole.

Concerns have been raised by nearby residents, particularly the impact of roof terraces, the loss of daylight & sunlight, and the noise and disturbance from the increased servicing activity. 101no. objections in total have been received. A table summarising the concerns is included in the report and the full representations are attached.

In respect of demolition and construction traffic, a construction logistics plan is required by condition. Subject to stringent controls on the operation of the development which would include a cap on the number of deliveries, details of which would need to be set out in a delivery and servicing management plan, it is considered that the proposed servicing arrangement would be acceptable.

There would be some minor reductions in sunlight and daylight to some residential premises in Willoughby House when considered against the pre-existing building, the baseline of a cleared site, and the consented scheme. However, the assessments carried out demonstrate that it is the presence of the balconies to these properties, rather than the bulk, height and mass of the proposed development that is the main factor in the relative loss of daylight and/or sunlight.

The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, energy efficiency, targeting minimum BREEAM 'Excellent' and aspiring to BREEAM 'Outstanding', and adopting Circular Economy principles.

The proposals have been found to preserve the significance of all designated heritage assets including any contribution made by setting, with the exception of St Paul's Cathedral. The uppermost storeys of the proposals would be fleetingly visible from the South Bank, including an instance behind the Cathedral's northern tower and pediment which are presently seen against clear sky.

Within this viewing experience, tall buildings frequently appear behind or 'backdrop' the Cathedral, varying in the degree of interaction with the Cathedral's silhouette. The impact of the proposals can therefore be understood as consistent with this wider character of this kinetic viewing experience; however, Officers consider the proposals would result in a very slight erosion to the current established setting of this Grade I listed building, through brief instances of loss of open sky in the backdrop of the cathedral. Officers therefore concur with Historic England, the Cathedral and other objectors acknowledging that this results in a level of less than substantial harm to the significance of this Grade I designated heritage asset; but, given the very fleeting and quite elusive nature of this impact, Officers consider the harm to be slight, at the lowest end of the scale. Officers further note that this has not resulted in an in-principle objection from Historic England, again reflecting the fleeting nature of this impact.

Due to this single identified instance of heritage harm, in this case adverse visual indirect impacts on a Grade I designated heritage asset and local strategic views of St Paul's as defined in the Protected Vistas SPD and specifically the St Paul's Heights Code, there arises a degree of conflict with London Plan C (1:a:i), Local Plan CS 12(1), CS 13(2), , DM 12.1 (1&4) and Emerging City Plan Policies S11 2, 3(a), S12 8(a&c) and 10(b), S13 (2), HE1(1).

The site is not located within an area identified as inappropriate for a tall building. Officers have thoroughly assessed the qualitative impact of the proposals, and find while most parts of London Plan D9 and are complied with, some conflict with London Plan D9 C (1:a:i) arises due to adverse impacts on designated heritage assets and views, for the same reasons creating conflict with draft City Plan 2040 S12 (2,8a & c,10:b) and S13:2.

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. Whilst there is some conflict with the tall building, strategic view and heritage policies mentioned above, given the counteracting benefits which promote other policies, particularly delivery of office floor space and improvement to the public realm, the proposals are considered to be acceptable.

As set out in paragraph 205 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be). St Paul's Cathedral is a Grade I listed building, and this places it close to the very highest status level and as a result, great weight should be given to the asset's conservation.

NPPF paragraph 208 requires that any less than substantial harm be weighed against the public benefits of the development proposal. The paragraph 208 balancing exercise is to be applied when considering the indirect impacts and resulting slight less than substantial harm to one Grade I listed designated heritage asset of the utmost heritage value.

Therefore, an evaluation of the public benefits and the weight afforded to them has been undertaken. In doing so great weight has been attached to the heritage significance of the designated heritage assets and to the advice from Historic England. The delivery of the office space in this location, alongside the vast improvement to one of the larger accessible open spaces within the City, and the economic benefits for the City and London are considered to be benefits of great importance. In addition, there are wider public benefits including the new community hub and opportunities for high quality and engaging cultural intervention through the alterations to New Union Street. In this case it is considered that the slight level of less than substantial harm to the Grade I listed heritage asset is outweighed by the public benefits of the proposal and accordingly the requirements of paragraph 208 are met. This conclusion is reached even when giving great weight to heritage significance as required under statutory duties.

Overall, the proposals are found to strike a balance between balancing heritage impacts and optimising the use of land, delivering high quality office space, and significant transformational improvements to the public plaza. The proposal is therefore in substantial compliance with the development plan policies that relate to it and in particular it supports the objective of promoting the City as the leading international financial and business centre.

Taking all material matters into consideration, Officers are of the view that the material considerations which weigh in favour of the grant of planning permission outweigh the identified conflict with the development plan and other material considerations which weigh against the grant of planning permission.

In this case, the proposal complies with the majority of development plan policies but is not compliant with elements of the policies regarding heritage and local strategic views as outlined above and in the ensuing report. Officers consider that overall, the proposal accords with the development plan as a whole.

When taking all matters into consideration, subject to the recommendations of this report, it is recommended that planning permission be granted for the proposed development subject to all the relevant conditions being applied and the S106 agreement being entered into to secure the public benefits and minimise the impact of the proposal.

Recommendation

- (1) That 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 subject to:
 - (a) Planning obligations under Section 106 of the Town and Country Planning Act 1990 and Section 278 of the Highway Act 1980 and other agreements being entered into in respect of those matters set out in the report, the decision notice not to be issued until the relevant agreements have been executed.
- (2) That your Officers be instructed to negotiate and execute obligations and other agreements in respect of those matters set out under "CIL, Planning Obligations and Related Agreements" including under Section 106 and Section 278.

APPLICATION COVER SHEET

| TOPIC | | INFORMATION | | | |
|-------|--------------------------------------|--|--|--|--|
| | | Pre-Existing Building | Extant 2020 Consent | Proposed February 2024 | Proposed September 2024 |
| 1. | Building Height | 54.3m AOD 40.3m AGL | 87.9m AOD 73.9m AGL | 99.9m AOD 85.9m AGL | 95.2m AOD 81.2m AGL |
| 2. | Floorspace (GIA) | Office (E(g)(i)) = 15,465 sqm Retail (E) = 363 sqm Community (F2(b)) = 0 sqm Sui Generis = 335 sqm TOTAL = 16,163 sqm | Office (E(g)(i)) = 27,735 sqm Retail (E) = 798 sqm Community (F2(b)) = 0 sqm Sui Generis = 0 sqm TOTAL = 28,178 sqm | Office (E(g)(i)) = 34,701 sqm Retail (E) = 556 sqm Community (F2(b)) = 179 sqm Sui Generis = 0 TOTAL = 35,436 sqm | Office (E(g)(i)) = 33,758 sqm Retail (E) = 287 sqm Community (F2(b)) = 142 sqm Sui Generis = 0 sqm TOTAL = 34,187 sqm |
| 3. | Employment | Total = 910 20% absentee = 728 | Total = 1,809 20% absentee = 1,447 | Total = 2,326 20% absentee = 1,861 | Total = 2,276 20% absentee = 1,821 |
| 4. | Car Parking Spaces | 51 | 0 <i>(13 remaining in basement outside of redline)</i> | 0 | 0 |
| 5. | Cycle Parking Spaces (TOTAL) | 0 | <u>Long Stay</u> = 317 <u>Short Stay</u> = 34 | <u>Long Stay</u> = 489 <u>Short Stay</u> = 39 | <u>Long Stay</u> = 489 (London Plan requirement is 472) ¹ <u>Short Stay</u> = 22 (London Plan requirement is 34) ² |
| 6. | Cycle Parking Spaces (Office) | 0 | N/A | <u>Long Stay</u> = 485 <u>Short Stay</u> = 17 | <u>Long Stay</u> = 474 (London Plan requirement is 469) <u>Short Stay</u> = 17 (London Plan requirement is 17) ³ |
| 7. | Cycle Parking Spaces (Retail) | 0 | N/A | <u>Long Stay</u> = 4 <u>Short Stay</u> = 22 | <u>Long Stay</u> = 2 (London Plan requirement is 2) <u>Short Stay</u> = 15 (London Plan requirement is 15) |

¹ 489 figure includes the 12 spaces designated for short-stay provision within the long-stay storage. Additionally, an overprovision of 5 long-stay spaces is achieved by the September 2024 Scheme.

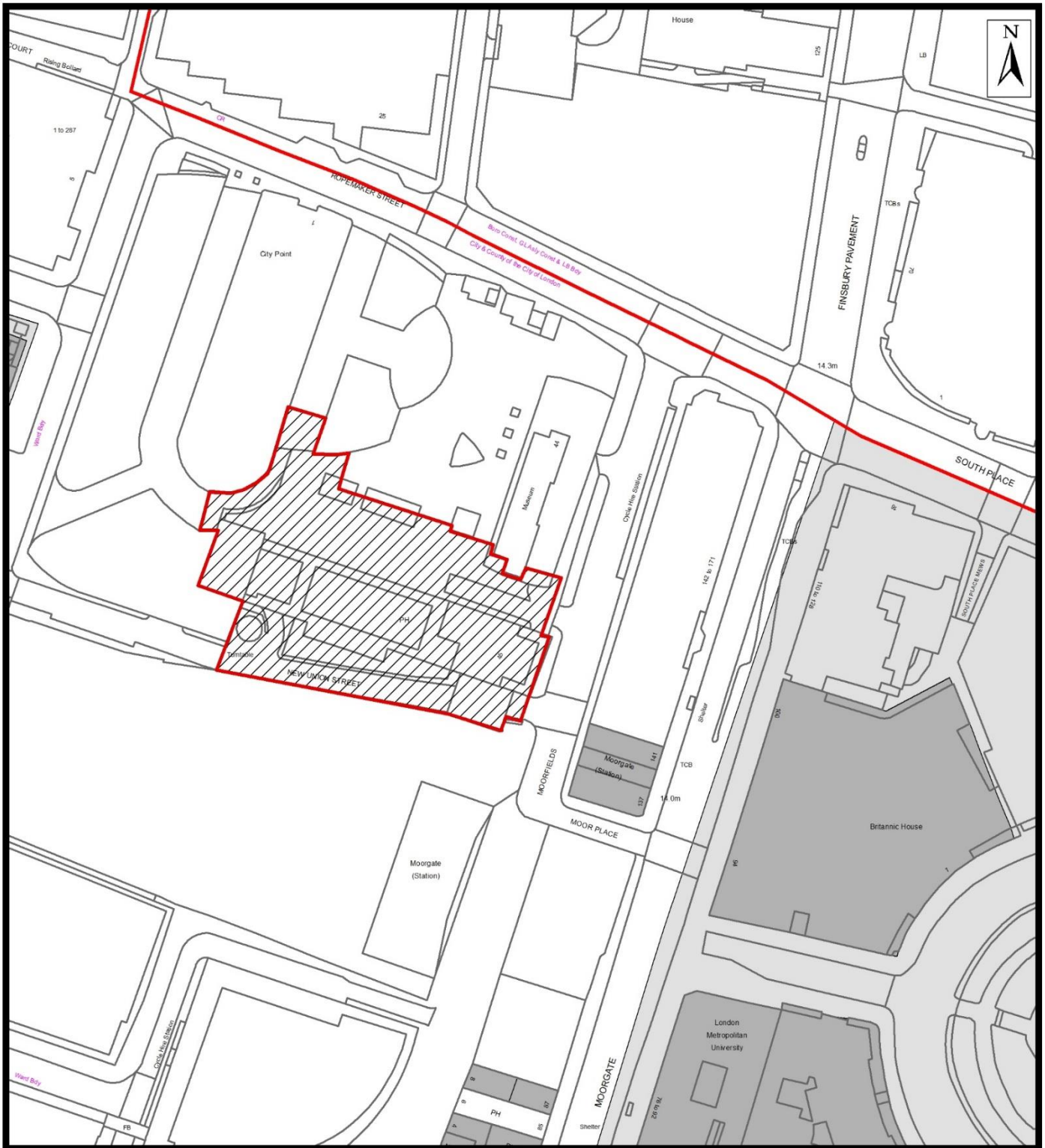
² The shortfall of 12 short-stay spaces is provided within the main long-stay cycle storage.

³ Of the 17 Short Stay Spaces, 5 will be provided externally and 12 within the main long-stay cycle store.

| TOPIC | | INFORMATION | | | |
|-------|-------------------------------------|--|--|--|--|
| | | Pre-Existing Building | Extant 2020 Consent | Proposed February 2024 | Proposed September 2024 |
| 8. | Cycle Parking Spaces (Community) | 0 | N/A | Long Stay = N/A Short Stay = N/A | Long Stay = 1 (London Plan requirement is 1) Short Stay = 2 (London Plan requirement is 2) |
| 9. | Lockers | 0 | 342 | 489 | 345 |
| 10. | Showers | 0 | 33 | 29 | 33 |
| 11. | Trip Generation | | AM Peak (2-way) (TRAVL) = 839 PM Peak (2-way) (TRAVL) = 692 | AM Peak (2-way) (TRICS) = 746 PM Peak (2-way) (TRICS) = 811 | AM Peak (2-way) (TRICS) = 725 PM Peak (2-way) (TRICS) = 789 |
| 12. | Deliveries | Total = 42 per day Consolidated = N/A | Total = 67 per day Consolidated = 41 per day | Total = 88 per day Consolidated = 44 per day | Total = 82 per day Consolidated = 41 per day |
| 13. | Delivery Vehicle Types | N/A | For worst-case trips Motorbikes / Cycles = 21 Car = 18 Vans = 25 Rigid 3 axle = 2 Rigid 4 axle = 1 | For consolidated trips Motorbikes = 2 Car = 13 Vans = 22 Rigid 3 axle = 6 Rigid 4 axle = 1 | For consolidated trips Motorbikes = 2 Car = 13 Vans = 21 Rigid 3 axle = 5 Rigid 4 axle = 0 |
| 14. | BNG | N/A | N/A | 1.55 biodiversity units 4.19 units per ha | 1.55 biodiversity units 4.19 units per ha |
| 15. | UGF | N/A | 0.36 | 0.32 | 0.32 |
| 16. | Additional Open Space | N/A | 0 | 124.5 sqm | 124.5 sqm |
| 17. | Additional Permissive Path | N/A | 0 | 30.3 sqm • (156.9 sqm added) • (126.6 sqm removed) | 30.3 sqm • (156.9 sqm added) • (126.6 sqm removed) |
| 18. | Retained Fabric | N/A | 0% | 10% by volume | 10% by volume |
| 19. | Operational Carbon Emission Savings | N/A | N/A | 17.2 tonnes per annum 14% over Part L baseline | 18 tonnes per annum 16% over Part L baseline |

| TOPIC | | INFORMATION | | | | | | | | | | | | | | | | | | | | | |
|-------------------------------------|---|---|------------------------------------|---|---|----------|-----------------------|---------------------|------------------------------------|-----------------------|---------------|-----|-----|---|------|------------------|-----|-----|---|-----|-------------------------------------|-----|-----|
| | | Pre-Existing Building | Extant 2020 Consent | Proposed February 2024 | Proposed September 2024 | | | | | | | | | | | | | | | | | | |
| 20. | Operational Carbon Emissions | N/A | | 1,080 kgCO2/sqm GIA | 1,161 kgCO2/sqm GIA | | | | | | | | | | | | | | | | | | |
| 21. | Embodied Carbon Emissions – A1 – A5 | N/A | N/A | 758kg CO2e/sqm GIA <i>(871.1kg CO2e/sqm GIA including 15% contingency)</i> | 750kg CO2e/sqm GIA <i>(862.5kg CO2e/sqm GIA including 15% contingency)</i> | | | | | | | | | | | | | | | | | | |
| 22. | Whole Life Carbon Emissions – A-C excluding B6-B7 | N/A | N/A | 1,161kgCO2/sqm GIA <i>Incl. sequestered carbon*</i> | 1,185kgCO2/sqm GIA <i>Incl. sequestered carbon*</i> | | | | | | | | | | | | | | | | | | |
| | | <div style="text-align: center;"> <p>Tenter House - Life Cycle Emissions GLA Benchmarks Comparison</p> <table border="1"> <caption>Tenter House - Life Cycle Emissions Data</caption> <thead> <tr> <th>Category</th> <th>A1-A5 (kgCO2e/m2 GIA)</th> <th>B-C (kgCO2e/m2 GIA)</th> <th>Sequestered carbon (kgCO2e/m2 GIA)</th> <th>Total (kgCO2e/m2 GIA)</th> </tr> </thead> <tbody> <tr> <td>GLA Benchmark</td> <td>950</td> <td>450</td> <td>0</td> <td>1400</td> </tr> <tr> <td>GLA Aspirational</td> <td>600</td> <td>370</td> <td>0</td> <td>970</td> </tr> <tr> <td>Tenter House (September Submission)</td> <td>750</td> <td>524</td> <td>90</td> <td>1364</td> </tr> </tbody> </table> <p><i>Figures do not include 15% RIGS contingency</i></p> </div> | | | | Category | A1-A5 (kgCO2e/m2 GIA) | B-C (kgCO2e/m2 GIA) | Sequestered carbon (kgCO2e/m2 GIA) | Total (kgCO2e/m2 GIA) | GLA Benchmark | 950 | 450 | 0 | 1400 | GLA Aspirational | 600 | 370 | 0 | 970 | Tenter House (September Submission) | 750 | 524 |
| Category | A1-A5 (kgCO2e/m2 GIA) | B-C (kgCO2e/m2 GIA) | Sequestered carbon (kgCO2e/m2 GIA) | Total (kgCO2e/m2 GIA) | | | | | | | | | | | | | | | | | | | |
| GLA Benchmark | 950 | 450 | 0 | 1400 | | | | | | | | | | | | | | | | | | | |
| GLA Aspirational | 600 | 370 | 0 | 970 | | | | | | | | | | | | | | | | | | | |
| Tenter House (September Submission) | 750 | 524 | 90 | 1364 | | | | | | | | | | | | | | | | | | | |
| 23. | BREEAM | N/A | Excellent, targeting Outstanding | Excellent, targeting Outstanding | Excellent, targeting Outstanding | | | | | | | | | | | | | | | | | | |
| 24. | NABERS | N/A | N/A | Targeting NABERS 5* | Targeting NABERS 5* | | | | | | | | | | | | | | | | | | |

Site Location Plan



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ADDRESS:
Tenter House, 45 Moorfields

CASE No.
24/00209/FULMAJ

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



ENVIRONMENT DEPARTMENT

Site Photographs



Image 1: North elevation of original building from City Point Plaza



Image 2: CGI of Consented building from City Point Plaza



Image 3: North elevation of site under demolition from City Point Plaza (21 Moorfields behind)

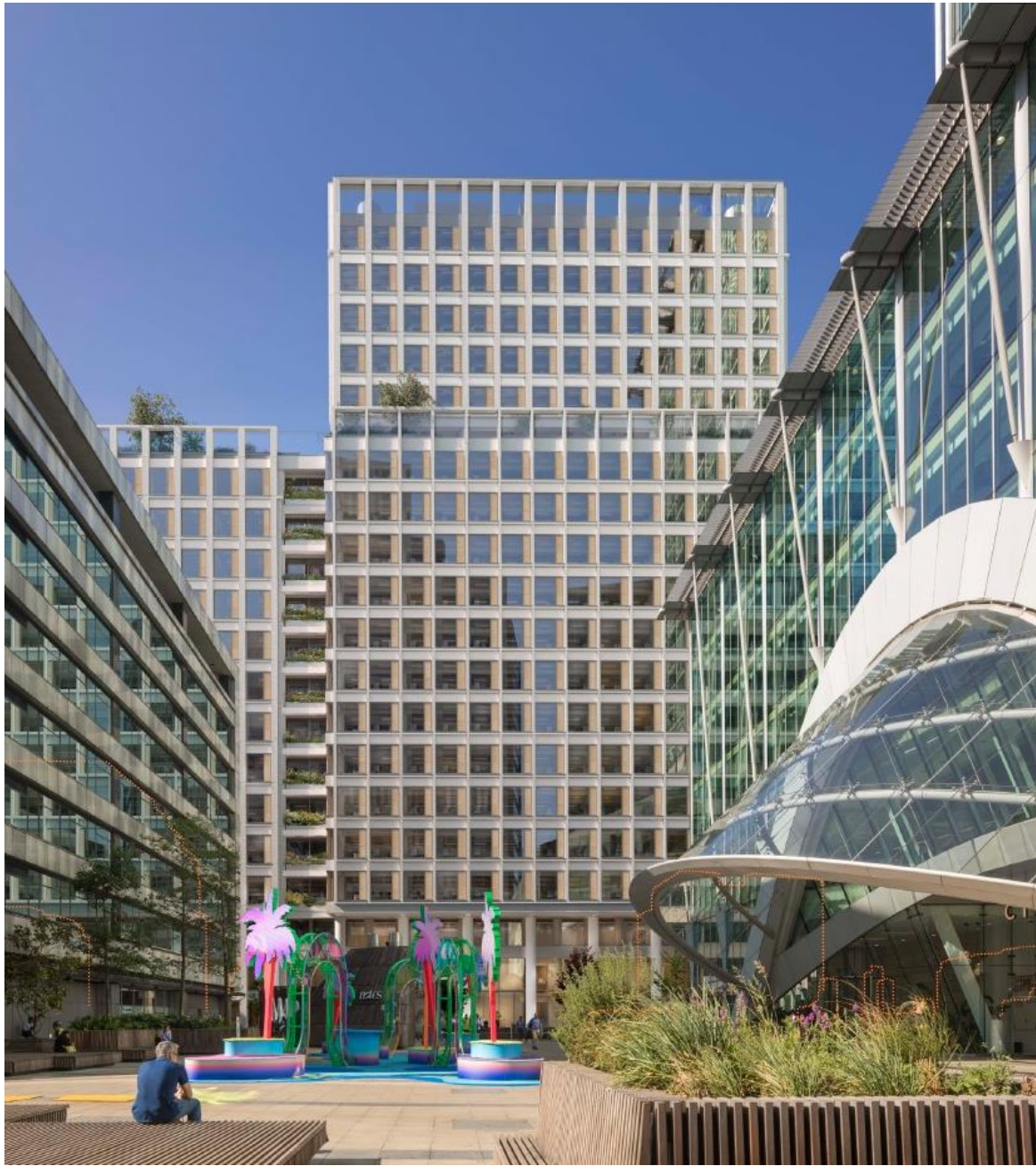


Image 4: CGI of proposed building from City Point Plaza



Image 5: East elevation of original building from Moorfields



Image 6: East elevation of site from Moorfields – currently under demolition



Image 7: CGI of proposed east elevation from Moorfields



Image 8: Existing entrance to New Union Street from Moorfields



Image 9: CGI of proposed entrance to New Union Street from Moorfields



Image 10: Entrance to New Union Street from Moor Lane



Image 11: Ramp to Plaza to be removed



Image 12: Aerial CGI of proposed building



Image 13: CGI of proposed north elevation from City Point Plaza



Image 14: CGI of proposed entrance to New Union Street (without artwork)



Image 15: CGI of proposed Plaza landscaping



Image 16: CGI of proposed restaurant to Moorfields and Plaza



Image 17: CGI of proposed East Elevation balconies



Images 18 and 19: Class E unit to west of site showing steps to Plaza





Image 20: CGI of proposed step free Plaza and entrance to Community Space



Image 21: CGI of proposed building from north

Main Report

Site and Surroundings

1. The site fronts City Point Plaza, with Moorfields running along its eastern boundary and New Union Street abutting its southern boundary. New Union Street is a private street which provides service access to City Point Tower and Tenter House, and is used as a pedestrian thoroughfare between Moor Lane and Moorfields. The western boundary of the site is a party wall condition with City Point Tower.
2. The building is in the process of being demolished under extant planning permission 17/01050/FULMAJ (dated 29.09.2020). Prior to its demolition, the building comprised some 15,465 sqm of commercial floorspace (Class E Office) arranged over basement, ground and 10 upper levels with a small area of plant on the roof. The building extended by 5 storeys over the eastern end of New Union Street, where it shared a party wall with 21 Moorfields. The main entrance to the building was from Moorfields.
3. There was a public house situated at ground floor level (Class A4/Sui Generis) known as the Rack and Tenter, which extended to approximately 335 sqm, and was accessed from City Point Plaza.
4. The site includes 51 car parking spaces in the basement with no formal disabled or cycling provision. Vehicular access to this area is via a ramp which is located between the pre-existing Tenter House and the Red Cross Building to the north. Servicing for the pre-existing building took place from New Union Street.
5. The pre-existing building was constructed in the 1960s, as part of a three-building development focused around City Point Plaza and connected below ground by multi-level basements which extend underneath the plaza.
6. The site does not fall within a Conservation Area, but the Finsbury Circus and Barbican and Golden Lane Conservation Areas are located nearby. The site is not statutorily listed but is near a number of listed buildings, including; Grade II* Britannic House at 1-6 Finsbury Circus, Grade II 137-141 Moorgate, Salisbury House 31 Finsbury Circus, Electra House 76-92 Moorgate, and the Barbican Estate which is Grade II listed (buildings) and is a Grade II* Registered Historic Park and Garden.
7. The Site is not located within the geometrically defined corridors of any of the London Panoramas or Townscape Views identified in the LVMF (2012). However, the Site has the potential to affect Linear View 8A.1 (Westminster Pier to St Paul's Cathedral) and the River Prospect Assessment Points at 16B.2 (the South Bank: Gabriel's Wharf viewing platform to St Paul's Cathedral); Additionally, the site is

visible in kinetic views along the South Bank, protected under the St Paul's Heights Code outlined within the Protected Views SPD adopted 31st January 2012.

8. On the western side of Moor Lane is Willoughby House in the Barbican. This building is 7 floors above the second-floor podium and is in residential use. To the east of the site, on the other side of Moorfields, is 155 Moorgate. This building is ground plus 5 upper floors, in mixed retail use (ground floor) and office use above.
9. The following buildings surround the site to the north and south:
 - City Point Tower – Ground and 34 upper floors; office and retail uses. Extensively refurbished in 1998-2001.
 - 21 Moorfields – Mixed use development above and around the new Crossrail Station, replacement City Walkway, new urban square at podium level; rises to 15 storeys above podium at +93.465m AOD.
 - Moor House – Ground and 17 upper floors; office and retail uses; completed in 2005.
 - 44 Moorfields (Red Cross) – ground and 7 upper floors in office use; built in the 1960s.
 - Moorgate Exchange, 72 Fore Street – Ground and 12 upper floors in office and gymnasium/fitness centre use. Built in 2012-3.
 - Milton Court/The Heron - Ground and 33 upper floors; residential, educational and performance, and retail uses.
 - 20 and 22 Ropemaker Street – in LB Islington; Ground and 25 upper floors in office use. Recently completed.
 - 101 Moorgate – to south-east of the site; ground and 10 upper floors in mixed retail and office use. Nearing completion.

Relevant Planning History

10. In December 1997, outline planning permission was granted for the demolition of the existing building and construction of new building for office and retail uses within Classes B1 and A1, A2, A3 with car parking and servicing (3350/1AJ). This permission was not implemented.
11. In February 2002, planning permission was granted for the renewal of outline planning permission for redevelopment to provide office space and retail uses with car parking and services (3350/1AM). This permission was not implemented.
12. In October 2008, planning permission was granted for the renewal of outline planning permission 3350/1AM for redevelopment to provide office space and retail uses with car parking and servicing (22,400 sq.m, 13 storeys) (ref. 06/00687/FULL dated 24 October 2008). This permission was not implemented.

13. In March 2012, under reference 11/00297/OUTL, planning permission was granted for the replacement of an extant outline planning permission (ref. 06/00687/FULL) in order to extend the time limit for implementation of the redevelopment to provide office space and retail uses with car parking and servicing. This permission was not implemented.
14. In September 2020, planning permission was granted (ref. 17/01050/FULMAJ) for the demolition of the existing building and structures to existing basement slab level and construction of an 18 storey office building (Class B1) [28,071sq.m GEA] with ground and first floor retail (Class A1/A2/A3/A5) [798sq.m GEA], together with works to the two basements and the ground floor level with associated servicing, waste storage, plant facilities and cycle parking and public realm improvements to New Union Street [Total Floorspace 28,553sq.m GEA]. The maximum height of the building was +87.9m AOD. This permission has been lawfully implemented as confirmed by Certificate of Lawful Development granted in December 2023 (ref. 23/01153/CLEUD).

Background to the Development Proposals

15. As above, planning permission has been granted on multiple occasions for the demolition of Tenter House, with the most recent application for this, 17/01050/FULMAJ, being lawfully implemented. At the time of publication of this report, the building is being demolished to ground level to enable construction works to continue, be they under the previous permission, or this application should it be granted. Demolition of the building to ground is due to be complete by January 2025.
16. The demolition of the building as consented and implemented excludes the demolition of the Class E unit to the west of the site (which currently houses Pret a Manger), part of the City Point Plaza floor slab within the application red line boundary, the car park and access ramp, and part of New Union Street. This additional demolition is now included as part of this application.
17. The works to the plaza were previously excluded from the applications for planning permission, including the now implemented scheme, as they are under separate ownership. Following extensive negotiations with the neighbouring landowner, the Applicant is now able to propose works to the plaza including the removal and levelling of the car park access ramp. For the avoidance of doubt, the implemented scheme from 2020 does not include any improvement works to the plaza.
18. Regarding the demolition of the 11-storey building, National Planning Practice Guidance (NPPG) states that “where the demolition of one or more buildings is required as part of a redevelopment, details of the demolition can be included in

the planning application”, not that it must be included. Demolition of non-listed buildings outside of conservation areas is also permitted development under Class B of Part 11 of Schedule 2 of the General Permitted Development Order 2015 (as amended).

19. The applicant has stated that, should planning permission under this application not be granted, they would continue to implement the previous consent for an 18-storey building once the demolition works have been completed.
20. As a result of the previous permission being implemented and the 11-storey building being demolished under that extant consent, the baseline position has changed. As such, the 11-storey original Tenter House building will hereafter be referred to as the ‘pre-existing’ building.
21. The building is in the process of being demolished during the determination of this application, and is likely to be either substantially or totally demolished (down to ground floor slab minus the Pret-a-Manger unit) by the end of 2024 (early 2025 at the latest). As the 2020 permission has been lawfully implemented, however, demolition and construction works pursuant to those approved could take place in perpetuity.
22. For the purposes of all technical reports submitted with this application, the baseline is a ‘cleared site’ in accordance with the extant consent, whilst the likely effects over and above the permitted 2020 scheme have been included for comparative purposes.
23. This means that in the ensuing assessment, Officers have considered the likely effects of the proposed development against (a) the clear site (save for the aspects of the building not originally proposed to be demolished as they were outside the scope of demolition in the extant consent) and (b) the effects of the 2020 scheme in comparison to the 2024 proposed development.
24. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
25. The NPPG makes clear at Paragraph 010 that extant planning permissions may be a material consideration in the determination of a planning application. In this case, the materiality of the permitted 2020 scheme is twofold:
 - (1) The 2020 permission established an acceptable scheme and impacts in planning terms when assessed against the adopted Development Plan and other relevant guidance in place at that time; and
 - (2) The 2020 permission has been lawfully implemented and is capable of being built out and completed.

26. As established by *R v SSE and Havering B.C. Ex.p. P. F. Ahern (London) Ltd* [1998] Env. L.R. 189, the weight afforded to an extant planning permission in the consideration of a new planning application differs depending on whether it is a viable fallback and there is a realistic prospect of it being built out if the current application for planning permission is not granted. The Applicant has stated that should planning permission under this application not be granted, they would continue to implement the extant consent. Officers have no evidence to the contrary to suggest that the fall-back position of the 2020 permission is not a viable and realistic prospect.
27. As the 2020 permission is a realistic fall-back position, the above case law sets out that a comparison must be made between the proposed development and the fall-back option, namely 'if whether the proposed development in its implications for impact on the environment, or any other relevant planning factors, [is] likely to have implications worse than, or broadly similar to, any use which the site would or might be put if the proposed development were refused'.
28. As such, it is reasonable and appropriate, and required, for the local planning authority to consider the relative difference between the scheme that has been permitted and implemented versus that now proposed.
29. With regards the likely environmental effects of the proposed development when compared to the cleared site as baseline and the extant permission being implemented, in accordance with Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017, an Environmental Impact Assessment (EIA) Screening Request was submitted by the Applicant.
30. The Screening Request considered that, as the implemented 2020 scheme was determined to not be EIA development, although the baseline position has now changed (being a cleared site), the proposals still do not fall to qualify as Schedule 1 or 2 development, nor do they meet the selection criteria set out in Schedule 3 of the 2017 Regulations.
31. Officers agreed with this approach and subsequently issued a Screening Opinion on 08.03.2024 in accordance with Regulation 5(c) of the 2017 Regulations, stating that the proposed development scheme is not likely to have a significant effect on the environment and therefore did not warrant the submission of an EIA/Environmental Statement.
32. As part of the CoL Carbon Options Guidance Planning Advice Note, adopted March 2023, major development proposals should undertake carbon optioneering which includes a variety of different schemes, to be independently verified by a third-party, to aid the decision-making process. Optioneering is undertaken to find

the best balance in carbon emission terms prior to adding other considerations into the planning process.

33. Optioneering has not been undertaken for this proposal as the building is being demolished under a separate lawfully implemented permission, as outlined above. Officers did not consider it reasonable to require optioneering on the areas of additional demolition now proposed under this application, namely the Pret a Manger unit and the plaza floor slab/car park access ramp, and consider that the scheme as proposed would achieve an outstanding, best in class building that contributes to an attractive and vibrant City environment, as discussed in the Sustainability section of this report.

Application Proposals

34. Planning permission is sought for additional demolition of the remaining structures on site as discussed above, then the erection of a part 14-storey, part 21-storey building for office use, with one ground floor retail unit, community floorspace at ground floor level, alterations to City Point Plaza (open space), reconstruction of New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant and associated works.
35. The development would provide 33,758sq.m (GIA) of office (Class E(g)(i)) floorspace, 287 sq.m (GIA) retail (Class E(a/b)) floorspace, and 142sq.m (GIA) community floorspace (Class F2(b)).
36. The proposals would provide extensive improvements to the public realm around the site, including re-landscaping of part of City Point Plaza with extensive urban greening following the filling in of the car park access ramp, re-landscaping of New Union Street as an improved pedestrian priority thoroughfare, and pulling back of the eastern building line to provide enhanced pedestrian experience along Moorfields.
37. The building would rise to +95.25m AOD to the top of the 21-storey element, and to +71.55m AOD to the top of the balustrade to the 14-storey element, itself being +69.1m AOD in height to finished floor level. The building would be a maximum of 81.2m AGL. The proposals as originally submitted were for a ground-plus-21 storey building at +99.9m AOD, but this was reduced during application stage as addressed in the Architecture, Views and Heritage sections of this report.
38. The changes to the scheme from those originally submitted are as follows:
 - The reduction to the maximum height of the proposed building by 4.66m, by removing the top floor and reducing the height of plant level;
 - The introduction of additional urban greening along the southern façade of the top storey of the proposed building;
 - The relocation of the proposed community floorspace from the first floor to the ground floor of the building to increase visibility and prominence of the

community use, and to encourage greater permeability of the ground floor and its interaction with City Point Plaza;

- The removal of one of the two retail units to coincide with the new location of the community space;
- The introduction of solar shading to the southern façade of the uppermost volume of the proposed building to minimise solar gain;
- The introduction of additional photovoltaic panels to be located on the surface of the solar shades to maximise renewable energy generation;
- The enhancement to the thermal performance of the cladding as a result of detailed design development;
- The addition of opening window panels to the first-floor façades;
- Development of the proposed building core to improve energy efficiency of the building; and
- Enhancements to the proposed planting on the 14th floor terrace.

39. The architectural concept has changed significantly since the 2020 scheme. The revised design is less highly glazed than the previous, and features a pre-cast concrete frame 'exoskeleton' with timber detailing, and timber framed openable windows.
40. The east elevation, fronting Moorfields, would feature double height landscaped balconies, arranged to provide access to external amenity space for tenants from all floor levels. The north elevation, fronting City Point Plaza is the primary façade and features a triple height colonnade over the proposed main entrance as part of the central volume, providing shelter for pedestrians using City Point Plaza. Further landscaping through planters create a greened junction between the facade on the north elevation at the junction between the primary, taller volume, and the lower volume to the east.
41. The south elevation is primarily a party wall with 21 Moorfields, and extends over part of New Union Street. For this reason, the majority of the south elevation would not have any windows, so cores and back of house functions have been placed here. The upper volume would feature windows to the south elevation where it rises above 21 Moorfields and the party wall.
42. The exoskeleton framing of the building to the west side of the north elevation, the west elevation, and south elevation allows for hanging gardens to the west volume, with the windows sitting back from the frame. There are no terraces proposed on the west elevation other than the western portion of the main 14th floor wraparound terrace. There would be a linear terrace at 19th floor level on the south elevation.
43. New Union Street would be reconstructed to become a pedestrian priority route east-west from Moorgate Station to the Barbican and beyond, noting that only a

portion of New Union Street is within the applicants' ownership. Servicing would take place in a loading bay accessed from New Union Street. The cycle store access is also from New Union Street.

44. The applicant is proposing four 'phases' of works, to be reflected in the conditions attached upon any grant of planning permission.
45. Phase 1 would cover demolition of the existing building (the Class E 'Pret a Manger' unit leftover following demolition of the previous 11-storey Tenter House under the 2020 permission) down to slab level. Phase 2 would cover the works to City Point Plaza, namely the demolition of the plaza slab, construction of new plaza basement and slab, and the plaza landscaping works. Phase 3 would cover the demolition of the ground and basement slabs of the 'building' and construction of the new basement of the building. Finally, phase 4 would cover the construction of the new building above ground floor slab.
46. For the avoidance of doubt, the planning permission as outlined in the description of development is not to be phased, nor is CIL (see CIL and Planning Obligations section of this report). The 'splitting up' of certain conditions would allow for the applicant to undertake certain works at different times pursuant to their agreements with neighbouring landowners – these are not material planning considerations but Officers are satisfied that the splitting up of conditions to cover separate phases of deconstruction and construction works would still allow for the relevant information to be submitted at appropriate times whilst allowing the development process to continue.

Consultations

Statement of Community Involvement

47. The applicants have submitted a Statement of Community Involvement prepared by LCA dated February 2024, outlining their public engagement in accordance with the City of London Statement of Community Involvement and Developer Engagement Guidance (2023). Their programme, conducted between September 2023 and February 2024, included advertisements in City Matters and the Islington Gazette, engagement with Officers and Members from both CoL and LB Islington, Residents Committees and House Groups from each of the Barbican Houses, Barbican Association, Barbican and Golden Lane Neighbourhood Forum, and general resident engagement. In terms of other stakeholders, meetings were held with neighbouring landowners, LSO Discovery, Barbican Renewal, Museum of London, EC BID, Guildhall School of Music and Drama, and the Culture Mile BID.
48. This engagement resulted in the following:
 - 1165 flyers delivered locally
 - 40 members of the public attended a public exhibition

- 265 visits to the consultation website
 - 10 calls and emails responded to from the public
 - 4 meetings held with political and community stakeholders
 - 7 pieces of written feedback received from consultation events
 - 259,813 people reached by social media adverts
49. Following the scheme amendments, the Applicant submitted a further Statement of Community Involvement by LCA dated August 2024. This includes details of further consultation with local residents, with St Paul's Cathedral, Historic England, and neighbouring landowners. A briefing with the Surveyor to the Fabric of St Paul's Cathedral was held on the 20th August, and a briefing with the Barbican residents was held on 3rd September to discuss the scheme amendments. The applicant contacted Historic England for a meeting on 6th August 2024, but Officers at Historic England confirmed via letter that further consultation by the Applicant was not necessary at that time.

Statutory Consultation

50. Following receipt of the application, it was advertised on and around the site in 5 locations, and in the press. Neighbour letters were sent to 767 nearby residential properties. Following amendments to the scheme, the application was re-advertised in the press, via site notice in the original 5 locations, and neighbour letters were re-sent to those all originally consulted as well as those who had submitted comments.
51. Copies of all received letters and emails making representations are attached in full and appended to this report.
52. At the time of publication, 101 letters of objection including duplicates due to the two rounds of consultation, 2no. letters of support and 1no. neutral letter have been received from nearby residents. A summary of the representations received, and the consultation responses is set out in the table below. The purpose of the table is not to reproduce the content of the significant number of objections but to provide a summary of the objections in a topic-based approach. Not all the representations below relate to material planning considerations. Those that are, have been dealt with in this report.
53. The views of other City of London departments have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.

| Consultation Response | |
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| Greater London Authority | Given the scale and nature of the proposals, conclude that the amendments do not give rise to any new strategic planning issues. Your Council may, therefore, proceed to determine the application without further reference to the GLA. |
| Greater London Archaeological Advisory Service (GLAAS) (Historic England) | No objection following revision of Archaeological Desk Based Assessment. Conditions recommended. |
| Historic England | <p>In respect of this new application, impacts on LVMF View 16B.2 The South Bank Gabriel's Wharf have been identified. The viewing platform provides views east towards the City of London and as a river prospect view, the Thames dominates the foreground.</p> <p>The focus of the view is St Paul's Cathedral, recognisable due to the distinctive silhouette of the dome and peristyle beside the western towers and pediment set against clear sky. Although the proposed development would not appear in the view from the spot identified in the LVMF, it would be clearly visible as one approaches the viewing platform via the walkway east of 16B.2.</p> <p>It will appear behind the western pedimented parapet with statue of St Paul at its pinnacle, filling the clear sky between it and the tower to the north of the west elevation with built form. Removing the clear sky from behind this distinctive element would dilute the effect of the highly characterful silhouette. The visual impact of the proposals does cause harm to the Grade I listed building through development in its setting.</p> <p><u>Recommendation</u> Historic England does not object in principle to these proposals as established in our previous responses to earlier planning applications on this site. However, Historic England considers the impact identified above would cause some harm, which would be less than substantial, through development within the setting of a designated heritage asset of the highest significance.</p> |

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| | <p>A reduction in the height of the scheme would help to mitigate against this harm and we would encourage you to pursue this with the applicants as part of your wider discussions about these proposals. In accordance with the NPPF, this harm to the significance of the Grade I listed St Paul's Cathedral will need to be weighed against the public benefits of the scheme by the City of London Corporation as part of your decision-making process.</p> <p><u>Officer response to comments:</u></p> <p>To note: HE's objection references impacts to LVMF view 16.B2. For clarity this view is entirely preserved. See Strategic Views and Heritage Assets section for further detail.</p> |
| St Paul's Cathedral | <p>The enlarged proposals will appear directly behind and impact the silhouette of the west front pediment in nearby views along the south bank of the Thames (east of Gabriel's Wharf).</p> <p>As appreciable from this part of the setting of the cathedral, the proposals will cause heritage harm to the significance of the Grade I listed building, affecting its architectural and historic special interest. This impact occurs to one of the most important and sensitive part of Wren's composition of this building, which is of exceptional heritage significance and sensitivity.</p> <p>We also consider this would run contrary to the guidance related to the backdrop and skyline setting of the Cathedral outlined within the City's Protected Views SPD.</p> <p>We understand that the proposals build on an extant consent. However, the additional height included within the submission scheme would lead to harm not previously present. It is our understanding that the extant consent is not appreciable in these views. The new scheme adds height where harm is appreciable and, in our view, can and should be avoided – not mitigated.</p> <p>We have also reviewed the submission pack, and to our knowledge cannot find any meaningful discussion of a 'no harm' option in the justification. In our view the 'no harm' option is exemplified by</p> |

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| | <p>the existing consent - which shows that there must be a viable and architecturally acceptable no-harm (not visible) scheme which, by dint of the approval granted, has been deemed compliant with policy.</p> <p>We welcome the technical work that has indicated with care and precision how the proposal is visible in views. We also recognise the design efforts made to reduce and mitigate harm by thoughtful consideration of detail and materials thus far, as outlined within the submission pack and within our consultation meeting.</p> <p>However, the lack of a 'no impact' option within the formal pack of submission materials is of concern and, to our understanding, does not satisfy the need to clearly and convincingly justify harm as outlined within the NPPF.</p> <p><u>Officer response to comments:</u></p> <p>See Strategic Views and Heritage Assets for response and full assessment.</p> |
| London Underground Infrastructure Protection | No objection in principle, subject to conditions. |
| Transport for London | <p>Agree in principle that the proposal would not result in an unacceptable impact to the TLRN, clarifications and conditions recommended.</p> <p><u>Officer response to comments</u></p> <p>Clarifications have been provided to TfL's detailed comments from the applicant, and TfL later confirmed that their queries had all been answered.</p> |
| Elizabeth Line Safeguarding | No objection subject to conditions. |
| NATS Safeguarding | The proposal does not conflict with the safeguarding area and therefore no objection is raised. |
| Thames Water | No objection subject to conditions. |
| City of Westminster | Does not wish to comment on the proposals. |
| LB Lambeth | No objection. |
| District Surveyor | Proposals comply with policies D5 and D12. |
| Cleansing | No objection. |
| Air Quality | No objection subject to condition. |

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| Environmental Health | Conditions recommended. |
| Lead Local Flood Authority | No objection subject to conditions. |
| City Gardens | <p>New trees and greening are welcomed, but the proposals include trees in planters at the ground floor at very large initial sizes, which are not likely to establish well or provide sustainable canopy cover. Condition recommended to secure details of tree species, sizes, soil volumes, planting, and maintenance details.</p> <p><u>Officers Response:</u> Landscaping details to be secured by condition.</p> |
| Barbican Quarter Action | <p>Concerns over impact on residential amenity over (i) the of scale and mass of the development leading to a loss of daylight and sunlight; (ii) light pollution from office spaces, (iii) noise from terraces; (iv) Impact on townscape and heritage, including increase of shoulder heights to Moor Lane bringing height closer to the Barbican Estate; (v) Impact of servicing routes on neighbourhood; (vi) Whole life cycle carbon assessment for 11 storey building.</p> <p><u>Officers' Response:</u></p> <p>Please see design and heritage sections for assessment of bulk, height and massing and impact to local townscape. Further discussion of impact to the Barbican Estate is included in the Heritage section. Daylight and Sunlight, amenity impacts including noise, light spill and overlooking are discussed in the Environmental Impacts section of this report. The servicing and delivery strategy is discussed in the Transport and Highways section of this report.</p> |
| Barbican Association | <p>Concerns over loss of residential amenity through impacts of loss of light and overshadowing, noise from terrace, building servicing plan, light pollution and spillage from offices; Townscape and heritage impacts, noting the potential impacts to views of St Paul's from the river, with reference to LVMF 8A.1 and 16B.1 and 16B.2, as well as cumulative impact of developments increasing height and mass to</p> |

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| | <p>Moor Lane; Whole Life Cycle Carbon Assessment and demolition (as part of the extant consent).</p> <p><u>Officers' response:</u> Please see a full assessment of bulk and massing in the Design section, and a full assessment of impact upon heritage assets in the heritage section. Further, assessment of impact upon strategic views of St Pauls is undertaken in the Strategic Views and Heritage sections, respectively. For other impacts please note the sections on Daylight and Sunlight, Whole Life-Cycle Carbon Assessment, Delivery and Servicing.</p> |
| <p>Barbican and Golden Lane Neighbourhood Forum</p> | <p>Impact on residential amenity through overlooking and noise from terraces, noise from reversing of vehicles in servicing area, night-time light spillage from offices; Concern over demolition of 11-storey building not being included in WLCA; Over-dominant visual impact through height and massing of the building; Potential harm to the Barbican Estate, Lutyens House, nearby conservation areas, and strategic views of St Paul's.</p> <p><u>Officers' response:</u> Please refer to the 'Representations (Objection)' section and 'Neighbouring Amenity' sections below for impacts to residential amenity. The demolition of the existing 11-storey office building is being undertaken pursuant to the extant consent from 2020, and is not included in the works relating to this application. This is discussed in the 'Background to the proposals' section below. Please see a full assessment of bulk and massing in the design section, and a full assessment of impact on heritage assets in the 'heritage' section. Further, assessment of impact upon strategic views of St Pauls is undertaken in the Strategic Views and Heritage sections, respectively.</p> |

| Representations (Objection) | |
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| Comment | Officer response |
| <p>Impact on Residential Amenity:</p> <ol style="list-style-type: none"> 1. Loss of Light and overshadowing | <ol style="list-style-type: none"> 1. Daylight/Sunlight assessment results showing no material adverse impact to daylight and sunlight to neighbouring properties over and above the extant permission. |

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| <ul style="list-style-type: none"> 2. Overlooking from balconies and terraces 3. Noise from office balconies and Terraces 4. Light pollution from offices 5. Nuisance from servicing vehicles on New Union Street | <ul style="list-style-type: none"> 2. Mitigation secured via condition, through restricted hours of use of East elevation balconies until 9pm on one day and 8am on the next. Restricted hours of use on level 14 and 19 terraces from 6pm on one day to 8am the next. No access on Saturdays, Sundays or bank holidays. 3. Mitigation secured via conditions through: Restrictions on hours of use and audible sound; No live or other music permitted on any external office amenity space; No promoted events permitted on the premises. 4. Lighting Strategy secured via condition and includes details on lighting control measures including time and movement sensors for all office and terrace lighting (except lighting for emergency signage); lighting illuminance and colour to be with automated turn-off system via astronomic timeclock set to 11pm in accordance with City of London Lighting SPD 2023. The installation of automatic blinds cannot be controlled through planning condition, but the Applicant has stated that the requirement for automated blinds would form part of any tenancy agreements for the office spaces to further mitigate nuisance from light spillage during out of hours working. 5. The servicing bay is located in the same location as the pre-existing and the 2020 consented scheme, and is accessed from New Union Street which is private highway. The proposal includes a consolidated delivery and servicing strategy along with the hours of delivery and servicing being restricted during peak hours of pedestrian traffic, and overnight. The servicing strategy is not materially different than the consented and represents an improvement over the pre-existing scenario that featured no controls of hours or vehicle numbers. Please refer to the 'Transport and Highways' section of this report for full assessment. |
| <p>Impact on Townscape and Heritage</p> | <p>The scheme is fully compliant with the management guidelines of the LVMF with no impact upon strategic views. With regards to local views, the scheme is considered consistent with</p> |

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| <p>1. Massing and Scale of development</p> | <p>the existing character of mid and tall rise buildings located in the site surroundings close to Moorgate Station. While it is acknowledged the proposals would appear in local views to the east of the Barbican Estate, including from within the estate interior, this is considered to preserve the existing character of these views, which take in a number of nearby developments of a similar or taller scale. The scheme is therefore not considered to harm the local townscape or impair the contribution of setting to the significance of heritage assets in the local vicinity.</p> <p>The proposals would be visible along stretches of the South bank, including west of Gabriel's Wharf. From this portion of the river bank, kinetic views of St Paul's Cathedral are visible and protected under the St Paul's Heights policy and Protected Views SPD. The proposals would be fleetingly visible in these views, including instances where the Cathedral is presently appreciated against clear sky. A degree of harm to the significance of St Paul's Cathedral, through indirect impacts to its setting, has therefore been identified. Amendments to the scheme have been made to reduce the extent of the adverse impact, including the addition of high-level greening so that the silhouette of the Cathedral's western façade remains distinct. Please see the Strategic Views, Heritage and Planning Balance section for a full assessment and response.</p> |
| <p>Impact on Carbon Emissions, including demolition from extant consent</p> | <p>The demolition of the 11-storey building is being carried out under the extant consent (ref: 17/01050/FULMAJ dated 29.09.2020) where the building is to be demolished and rebuilt to 18 storeys. The current application proposes a new 21 storey building with a revised design and enhancements to the public realm at City Point Plaza which includes the part demolition of the existing basement and an excess of 0.6m excavation from the existing basement level.</p> <p>The demolition works to the building on site are permitted as per the extant consent, therefore the existing building does not form part of the assessment of whole-life cycle carbon. Please see</p> |

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| | below 'Background to the Proposals' and 'Sustainability' sections of the report. |
| Transport impacts of the development including delivery and servicing strategy | Consolidated Delivery and Servicing to the site to a total of 41 deliveries in the day, along with delivery restrictions in peak hours from Mon – Fri: 0700 - 1000hrs; 1200 - 1400hrs; 1600 - 1900hrs. Please see the Transport section in this report for the full assessment of impacts. |

| Representations (Other) | |
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| Comment | Officer response |
| Support - 2 Supportive of replacement of existing structure with new modern building and improved public realm. | Noted. Officers are in agreement that the proposed development offers new Grade A office floor space in a prime location in the City adjacent to an important transport node, with enhanced facilities in line with the Local Plan Policies and strategic targets. The proposal would also deliver an enhanced public realm at City Point Plaza through increased urban greening, new seating, and level access across a previously stepped public plaza. |
| Neutral - 1 Effect of Transient Shadow results with pre-existing condition and proposed development. | Noted. This has now been provided and accounted for within the Daylight and Sunlight section of this report. |

Policy Context

54. 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.
55. The City of London (CoL) has prepared a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation in the Spring of 2024. During determination of this application, the Plan has been submitted to the Secretary of State for Examination in Public. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
56. 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.
57. 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”. Other relevant sections of the NPPF are set out in the following paragraphs.
58. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
59. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
 - a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
60. 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).
61. 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.
 62. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
 63. Paragraph 91 of the NPPF states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
 64. 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.
 65. Paragraph 97 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
 66. 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”.
 67. 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.

68. 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”.
69. 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.”
70. 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.
71. 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...’
72. 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.
73. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 157 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.

74. 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.
75. 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.
76. 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."
77. 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.
78. 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.

79. 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”.
80. 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”.
81. Paragraph 212 of the NPPF states “Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

Statutory Duties

82. 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, to local finance considerations and to any other material considerations. (Section 70(2) Town & Country Planning Act 1990);
 - To determine the application in accordance with the development plan unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
83. 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).

Considerations in this case

84. In considering this planning application account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
85. The principal issues in considering this application are:
 - The extent to which the proposals comply with the development plan;

- The extent to which the proposals comply with the NPPF;
- The appropriateness of the proposed uses;
- The impact of the development in design and heritage terms including impact on designated and non-designated heritage assets;
- The impact on strategic local views including those identified within the St Paul's Heights Policy CS13 and Protected Views SPD;
- The impact of the proposal on any archaeology beneath the site;
- The accessibility and inclusivity of the development;
- Transport, servicing, cycle parking provision and impact on highways;
- The proposed public realm and cultural offer;
- The impact of the proposal in terms of energy and sustainability;
- The impact of the proposed development on the amenity of nearby residential occupiers, including noise, overlooking, daylight, sunlight, and light pollution;
- The environmental impacts of the proposal including wind microclimate, thermal comfort, flood risk, and air quality;
- Acceptability of the proposed security, suicide prevention and fire safety arrangements;
- Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and the Human Rights Act; and
- The requirement for financial contributions and other planning obligations.

Economic Issues and the Principle of Development

86. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
87. 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.
88. 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.

89. 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.
90. 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.
91. 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.
92. 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.
93. 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.

94. 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; 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.
95. The London Plan projects future employment growth across London, projecting an increase in City employment 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.
96. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
97. 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.
98. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet projected economic and employment growth 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 flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces and creating an inclusive, healthier and safer City for everyone.

99. The draft City Plan (2040) policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 1,200,000sqm during the period 2021-2040. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.
100. The application site is located within the 'North of the City' policy area in relation to Strategic Policy CS5 of the adopted Local Plan 2015, and within the Smithfield and Barbican Key Area of Change in the draft City Plan 2040 versions, covered by Strategic Policy S23.
101. The Smithfield and Barbican Key Area of Change is intended to be a general strategic area where mixed-use development, including those which are culture-led, are encouraged on appropriate major sites. The site is one such site. The site is also just outside the Barbican and Golden Lane Neighbourhood Area and Neighbourhood Forum, which were designated by the City Corporation on 18 July 2023.
102. Despite the short-term uncertainty about the pace and scale of future growth in the City following the recovery from Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2040 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 further reflected in the Corporations 'Destination City' vision for the square mile.
103. The proposed scheme would deliver on the City's objectives and support the City's economic role by providing 33,758 sqm (GIA) of flexible office floor space (an uplift of 17,958sq.m over the pre-existing building) alongside a complementary retail and community/cultural offer and extensive public realm.

Land Use

Provision of Office Accommodation

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

allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2040.

105. The predominant use of the proposed development is as office space, comprising of 33,758sq.m (GIA) of Commercial/Office Floorspace (including lobby) Class E (a net gain of 7534 sq.m of office floorspace on this site compared to the 2020 consented scheme and a gain of 17,958sq.m over the pre-existing building). The proposed office space is classified as Grade A office space.
106. Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City. The draft City Plan 2040, in Policy S4, seeks to deliver 1.2 million sqm net of new office floorspace in the period between 2021 and 2040. The apparent significant reduction in the 2040 City Plan compared with the previous City Plan 2036 target for office floorspace (2million sqm) is largely due to the passage of time and the significant office floorspace completions in the 2016-2021 period, totalling 835,000sqm. Overall, comparing the City Plan 2036 and City Plan 2040 floorspace targets is indeed similar due to the 2016-2021 period being met by completions.
107. At 31st March 2022, 835,000 sq.m net increase in office floorspace had been delivered since 2016 and a further 576,000 sqm net was under construction or was permitted in the City. 370,000sq.m of flexile office floorspace was approved in 2022.
108. The Offices Topic Paper as part of the evidence base for the City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The Site is within the 'rest of the City' category, which is modelled at being able to achieve an office floorspace uplift of 145,000sq.m. The proposed development would deliver a significant amount of this floorspace target for areas outside the Eastern Cluster and Fleet Valley, providing a total of 33,758sq.m of office floorspace, a net increase of 17,958sq.m over the pre-existing building.
109. The proposed office spaces are designed to support a range of tenants, with flexibility to accommodate a variety of tenant requirements and the demands of business growth, with options which offer a range of interior environment amenity, floor area, and choice of outlook. This would accord with emerging City Plan 2040 Policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.
110. 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. Provision of creative workspace would be secured through a S106 agreement. A Creative Workspace Management Plan would be secured through a S106

agreement which shall detail the location, specification, layout, facilities, operation and management of the creative workspace within the building. The creative workspace shall be provided at a discounted market rate to qualifying users.

111. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity 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 33,758sq.m (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 Retail/Food and Beverage and ‘Loss’ of the Public House (Sui Generis)

112. The site is not within a designated Principal Shopping Centre (PSC) or a Retail Link; however, the Moorgate PSC is located immediately to the east of the site as set out in the Local Plan 2015.
113. Local Plan policy DM20.1 encourages new retail units to be located within Principal Shopping Centres.
114. The retail provision within the pre-existing building comprised a public house known as the Rack and Tenter (Sui Generis, previously Class A4) (335sq.m), and 363sq.m which is currently occupied by Pret a Manger, and remains as part of the existing building as its demolition was not included in the implemented consent.
115. The implemented permission (17/01050/FULMAJ) featured 735sq.m (GEA) of retail floorspace (former classes A1/A2/A3/A5) through two units at ground and first floor level, and removed the Rack and Tenter. This was prior to the London Plan 2021 and its policy HC7 which seeks to protect public houses where they have heritage, economic, social, or cultural value to local communities or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones. The Rack and Tenter was one such public house.
116. Part (A) of London Plan Policy HC7 requires that, in making planning decisions, Local Authorities protect public houses, and for applications that propose the loss of public houses with the values as outlined above, that planning permission be refused unless there is authoritative marketing evidence.

117. As outlined in paragraphs 26-28 above, the 2020 permission which involved the loss of the public house is a realistic fall-back prospect, the lawful implementation of which is substantially underway. The Rack and Tenter closed in April 2023, when the applicant received vacant possession.
118. Although the loss of the pub is regrettable in the context of London Plan policy HC7 and the City's 'Destination City' initiative, it is no longer capable of being occupied and the use has ceased. Officers consider that the alternative public offer proposed under this application, being the proposed restaurant and community space, along with other planning benefits including the improvements to the Plaza, outweigh the benefits to the community and nighttime economy that could otherwise have been achieved through the retention or reinstatement of a public house. Great weight is afforded to the extant permission under which the public house was removed and the progress of its implementation via demolition of the building. The loss and lack of reinstatement of the public house under this application is acceptable, and The Rack and Tenter therefore does not fall to be considered further under this application.
119. Policy DM20.4 of the Local Plan 2015 states that proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated and policy CS20 states that new retail development should be focused on Principal Shopping Centres so that they become attractive shopping destinations. Policy S5 of the draft City Plan 2040 supports proposals that contribute towards the delivery of additional retail floorspace across the City to meet future demand and supports provision of retail uses that provide active and publicly accessible frontage across the City where they would not detract from the viability and vitality of the PSCs.
120. The proposed retail floorspace originally comprised 556sq.m GIA (Class E(a/b)) through two units at ground floor level; one in the location of the existing Pret a Manger unit within City Point Plaza, and one fronting Moorfields. However, through the amendments to the scheme, one of the retail units has been removed and replaced with the relocated community floorspace at ground floor. As such, the total proposed retail provision is now 287sq.m GIA (Class E(a/b)).
121. The new space proposed would be fit for purpose in the context of the changing retail market, being flexible and adaptable in layout and support of the long-term vitality and vibrancy within the City, and it would complement the neighbouring residential and commercial uses. The proposed retail component of the scheme would create active frontages that would enhance the public interest and vitality of the public realm across the site.
122. The proposed retail/food & beverage floorspace is acceptable, the mix of uses would provide a complementary use to the offices within the proposed building

on site in accordance with Policy DM1.5, as well as provision for other workers, visitors and residents of the City in accordance with Emerging City Plan Policy OF1. A condition is recommended to secure retail use falling within Class E(a/b), and to prevent the change to any other use within Class E.

Proposed Community floorspace

123. Policy CS22 of the Local Plan seeks 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.
124. The above policy under part (3) seeks to protect and enhance existing community facilities and provide new facilities where required, whilst allowing flexibility in the use of underused facilities, including places of worship, and states there should be no overall loss of community facilities in the City.
125. Policy DM22.1 of the Local Plan 2015 and policy HL5 of the draft City Plan 2040 state that the development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted where they would not be prejudicial to the business City, in locations where they are convenient to the communities they serve, are in or near identified residential areas providing their amenity is safeguarded.
126. Place specific policies CS5 of the Local Plan 2015 and policy S23 of the draft City Plan 2040 seek to identify and meet residents' needs in the north of the City including protection of residential amenity, community facilities and open space, as well as promoting cultural development in this area. In addition, the site is within the area covered by the Culture Mile BID which has been formed to promote the northwest area of the City as a major UK destination for culture and leisure.
127. The scheme originally proposed 179sq.m of community floorspace (Class F2(b)) at first floor level, accessed through the office security line. Through the scheme amendments, this has now been reduced to 142sq.m. However, the modest reduction is considered acceptable given the improved location of the unit within the building, now proposed at ground floor level, with direct access from City Point Plaza with users no longer required to pass through the office security line. The ground floor location of the unit would also provide fully inclusive access.
128. The provision of the community floorspace at ground floor level of the proposed building is welcomed in the context of the above-mentioned policies. The site is located near to the Barbican which is an identified residential area; as it forms part of an office development with retail provision it would not prejudice the

primary business function of the City and would be served by suitable retailing opportunities for its end users, and it would not harm the amenity of neighbouring occupiers.

129. A full Community Space Management Plan is required by S106 obligation to ensure the space is flexible and adaptable for a range of users, accessible, suitably managed to ensure the protection of neighbouring amenity and ease of access for users, and available at affordable rates, such as peppercorn rent or free to use for resident groups, to be secured through the S106 agreement.

Land Use conclusion

130. The proposed development for a significant increase in Class E office floorspace accords with the primary strategic aim of the Local Plan 2015 and the emerging City Plan, being to deliver new, Grade-A office floorspace to maintain the City's position as the world leading international finance and business centre.
131. The London Plan 2021, in policy D3(a), encourages a design-led approach to optimise the best capacity of land by ensuring that development is of the most appropriate form and land use for the site, and in policy E1(a) encourages the improvement to the quality, flexibility and adaptability of office floorspace through new provision of office floorspace, refurbishment and mixed-use development. The London Plan in policy SD5 reinforces the importance of office floorspace within the Central Activities Zone (CAZ) (which the site sits wholly within) and encourages intensification of office floorspace within the CAZ through redevelopment and refurbishment.
132. Local Plan 2015 policy CS1 seeks to ensure the long-term provision of office floorspace of the highest quality.
133. The provision of 33,758sq.m (GIA) of Class E(g)(i) office floorspace is therefore welcomed in the spirit of the aims of the adopted Local Plan and emerging City Plan, and Officers consider that the site has been optimised in line with the aims of the London Plan Policy D3.
134. The provision of community floorspace (Class F2(b)) and the provision of retail/F&B floorspace (Class E(a/b)) to complement the other proposed uses on site as well as neighbouring commercial and residential uses is also welcomed.
135. Overall, it is considered the proposed development is in accordance with policies CS1, DM1.2, DM1.3 and DM1.5 of the Local Plan 2015 and S4 of the emerging City Plan 2040, as well as the aims of the London Plan 2021, in delivering growth in office floorspace and employment, and policies S6, S23, S8, S14 and DE4 of the draft City Plan 2040.

Cultural Strategy

136. The provision of cultural offers within development proposals is of increasing importance. The City of London contains a huge concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Destination City is the City Corporation's flagship strategy, that seeks to ensure that the City is a global destination for workers, visitors, and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative, and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.
137. Strategic Policy S23 of the City Plan 2040 states that in respect of the Smithfield and Barbican area the City Corporation will improve the area by:
'Encouraging culture-led mixed-use development on major sites in the area; identifying and meet residents' needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space; seeking to minimise pollution levels through traffic management measures and increased green infrastructure in the public realm and on buildings; requiring improvements to pedestrian and cycle routes for all within and through the north of the City.'
138. The applicant has submitted a Cultural Plan to accompany the application, prepared by the Contemporary Arts Society. The Cultural Plan outlines two fundamental permanent offers delivered within the proposal, in line with the aspirations of the City Plan 2040, Destination City, the BID Strategy and the Areas of Change, as well as wider strategic thinking across London, nationally, and internationally.
139. The aims of the cultural plan for Tenter House are as follows:
- Permanent artwork along the soffit of New Union Street to be produced and curated by local community or cultural groups/artists;
 - Programmable community space and reception space within the building; and
 - Meanwhile use artwork along the construction hoardings

New Long-Term Cultural Offers

Landmark Artwork at New Union Street

140. The public realm at New Union Street would form a key new cultural connection between the Liverpool Street and the Barbican/Smithfield 'Area of Change'. A major new public art commission running the length of a covered New Union Street would support the Culture Mile BID by creating City North landmark/gateway statement which promotes greater physical connection

between major surrounding cultural institutions - including the Barbican Centre, Museum of London, Guildhall School of Music and Drama and The London Symphony Orchestra. The initiative would further support the Destination City initiative by providing attractive through routes from City North to the City South gateway of St Paul's Cathedral and onwards to Tate Modern, and Southbank.

141. Two potential approaches have been identified to develop and deliver a landmark artwork integrated into the architecture of the New Union Street covered design, which would be finalised through the Cultural Implementation Strategy secured through S106 obligation as well as conditions relating to details of the physical structures:
- (a) Digital screens to act as a 'digital canvas' to the soffit of New Union Street which would feature programmable content, to be produced by cultural organisations, schools and universities, or community groups.
 - (b) Permanent, static public artwork produced by a renowned contemporary artist or local cultural organisation.
142. The proposed artwork to New Union Street, whether digital or static, would enliven the street experience, providing an attractive covered route for pedestrians running east-west from Liverpool Street to the Barbican cultural centre, whilst being curated by local community and cultural organisations as part of an extensive engagement programme, to be confirmed through the Cultural Implementation Strategy.

New Designated Community Space and programmable lobby space

143. The ground floor reception area of the building has been designed to be flexible, to potentially accommodate small-scale, year-round cultural activity, including lunchtime or 'out of office hours' performances, readings, and recitals. These could potentially be programmed through the Culture Mile BID and their strong relationships with the major cultural providers in the immediate vicinity such as the Guildhall School of Music & Drama and LSO Discovery - the LSO's young musicians training programme, with details to be provided through the Cultural Implementation Strategy S106 obligation, including engagement with local cultural providers as outlined above.
144. The year-round small scale cultural activity in the ground floor reception area could be interconnected thematically with, and compliment, that of the ground floor Community Space (Use Class F2(b)). The flexible floorspace at ground floor level could be reconfigured easily to meet the needs of various groups and could include a creative, learning and skills development space for the expanding student music programmes in the area administrated by the major music focussed cultural organisations mentioned above. A Community Space Management Plan would be secured through S106 obligation, in conjunction with

the Cultural Implementation Strategy, to ensure that programming of the space is appropriate to safeguard the amenity of nearby residential occupiers, including noise attenuation and managed dispersal after office hours.

Meanwhile 'Use' artwork

145. Considering that the 11-storey Tenter House is being demolished under a previous consent, separate to this application for planning permission, there is an opportunity to develop a community participation construction hoarding artwork project. Temporary site hoardings offer opportunities for surprise activations, innovative programming, and experimentation. An artist experienced in the discipline of 'social practice' (artists who work with community to collaboratively develop and deliver an artwork response) could be commissioned to develop a hoarding artwork through community collaboration.
146. Site Hoardings have been installed in March 2024 alongside the extant planning permission and will remain until the completion of building work. Through the current planning application, the hoardings around site would change their shape and position between installation and completion in the summer of 2025.
147. Transforming the hoardings with art could provide an opportunity for local arts organisations, artists and young people to get involved in the future of the Site and its surroundings in the context of Destination City and local cultural organisations, reduce graffiti vandalism and anti-social activity near construction sites, and increase perceptions of safety through artwork, lighting, and enhanced legibility in the public realm.
148. A Culture Plan Steering Group would be established at the earliest stages of the project, to support and guide the delivery of the public art initiatives across the life of the development. This is to be detailed in the Cultural Implementation Strategy.

Culture conclusion

149. A public art strategy is required for the site to include new public art to New Union Street and to the construction hoardings secured by S106 obligation as part of the Cultural Implementation Strategy. This is required to cover the commissioning process, artistic merit, deliverability, siting, maintenance and management and stakeholder engagement with the community, Culture Mile BID and City Arts Initiative. Local Plan Policy CS11, DM 11.2 requires protecting existing and commissioning of new public artwork, and draft Local Plan CV2 and CV6 encourage the provision of new permanent and temporary artwork which is high quality, inclusive and diverse.

150. The provision of the community space at ground floor level in conjunction with the flexible space in the ground floor lobby is welcomed in the context of the relevant development plan policies outlined herein. Overall, the proposals would provide a robust cultural offer for the site that would act as a new destination for the City in line with the Destination City Agenda and the following policies of the Local Plan 2015: CS11, DM11.1 and CS5 and policies CV2 and S23 of the draft Local Plan 2040.

Design and Principle of a Tall Building

Principle of a Tall Building

151. The site is currently partially cleared as a result of the ongoing demolition of the eleven-storey building which occupied this location, with the site due to be fully cleared by January 2025. The proposals include one part 14-storey and part 21-storey [+95.25m AOD] office building. This would be defined as a tall building under the provision of the adopted Local Plan (CS13 para 3.14.1) and emerging City Plan 2040 (S12(1), >75m AOD) pursuant to London Plan D9 (A). Officers also note the consented scheme on this site was also considered a tall building, rising to +87.9m AOD at its highest point, only 7.35m lower than the now proposed building.
152. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a City Cluster (Local Plan policies CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040, with the addition of a smaller proposed cluster in the Holborn and Fleet Valley area (policies S12 (2) and S21).
153. The application site falls outside the 'Eastern Cluster/City Cluster' policy areas in the adopted Local Plan and emerging City Plan (CS7, fig. G; S21, fig. 28), and the proposed Holborn and Fleet Valley Cluster in the emerging City Plan (S12, fig. 14).
154. London Plan policy D9 B (3) stipulates that tall buildings should only be developed in locations that are identified as suitable in Development Plans. While seeking in an overarching sense to cluster tall buildings within the Eastern Cluster, the City's adopted Local Plan defines areas in which tall building proposals would be inappropriate in principle and should therefore be refused (CS14 (2), fig. N). These areas include conservation areas, the St Paul's Heights Policy Area, St Paul's protected vista viewing corridors and Monument views and setting. Under the provisions of the Local Plan the proposal site is not located in an area identified as inappropriate for tall building development.

155. Where a site lies both outside the Cluster and these inappropriate areas, then it would trigger CS14 (3), under which tall buildings would be permitted elsewhere in the City only on those sites which are considered suitable in relation to skyline, amenity, and heritage impacts. With reference to this policy, the application site lies outside these inappropriate areas and therefore a tall building here could be acceptable, subject to consideration of the criteria in CS14 (3). These impacts are assessed in detail below, and while modest impacts are identified, officers are of the view that these are not of the order of magnitude to render the site inappropriate, in principle, for a tall building.
156. Emerging City Plan 2040 specifies, in accordance with London Plan D9, areas where tall buildings would be appropriate in principle. As mentioned above, the 2040 Plan identifies such areas in the existing City Cluster and the new proposed Cluster at Holborn and Fleet Valley. The application site is not within either area, so would be considered inappropriate for a tall building in principle in respect of the 2040 Plan. However, because this Plan has undergone Regulation 19 Consultation and is shortly to commence with Examination in Public (EiP) anticipated in Winter/Spring 2024/2025, its provisions can be afforded only limited weight compared to the adopted 2015 Plan.
157. Notwithstanding this, in *R (OAO LB of Hillingdon) v. Mayor of London* (2021) [EWHC 3387 (Admin)] the High Court held that London Plan policy D9 B was not a pre-condition or 'gateway' to the application of the criteria in D9 C, a qualitative assessment of the impact of a proposed tall building. In other words, even where a proposed tall building falls outside an area identified as suitable in a Development Plan under part B, the impacts of the proposed tall building as set out in part C should still be considered.
158. An assessment against London Plan Policy D9 (C) and (D) is made below, with reference where relevant to other sections of this report for more detail. It is found that the proposal would largely satisfy the criteria in (C) and (D), but there would be some conflict with Part C (1; a; i) in terms of long-range visual impacts to consider in the policy balance.
159. The site is in the Central Activities Zone, and the proposal would complement the unique international, national and London-wide role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant office functions, in line with London Plan Policy D4. It would be in a highly accessible and sustainable location, with the highest PTAL Level of 6B, with excellent access to transport infrastructure including active travel. The site would deliver 2.8% of the required commercial space to meet projected economic and employment growth demand until 2040. This quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre. Officers consider the proposal

draws strong support from the above. Balancing the requirements to deliver on these policies is at the heart of the design-led optimisation of site capacity when assessing this against wider heritage and design policies.

160. As a matter of planning judgement it is considered that the proposal would accord with London Plan Policy D9 A, B and D, Local Plan Policy CS14 , draft City Plan 2040 S12 (1, 3, 4-7, 8:b,d-e,9, 10:a,c-k), S13 (1,3-4). There is some conflict with London Plan D9 C (1:a:i) and draft City Plan 2040 S12 (2,8:a&c,10:b), S13:2 and HE1(1) due to slight, very minor less than substantial harm to St Paul's Cathedral, through a fleeting, adverse indirect impact on the contribution of setting, specifically its skyline presence. These impacts are identified below and addressed throughout the report. These conflicts with Development Plan policy are addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the planning balance.

Tall Buildings – Impacts

161. This section assesses the proposals against the requirements of D9 C (1-4) and D of the London Plan. The visual, functional, and environmental impacts are addressed in turn.

Visual Impacts – C (1)

162. The site is located within the north-west locality of the City, in an area strongly characterised by modern development along Chiswell Street and west of Moorgate, an important north-south axial road through the City. Further to the west, the post-war development of the Barbican Estate creates a distinct change in character, forming a large scale, continuous, post-war architectural composition. The general character of the immediate site surroundings is of large, modern and historic mid-rise buildings with smaller groups of historic buildings of a finer scale and grain to the south east particularly along London Wall. The Barbican Towers form striking skyline features to the west and there are a number of other >75m existing tall buildings in the locality, as follows:

- Alban Gate (100.7m AOD)
- 120 London Wall (96.7m AOD)
- 21 Moorfields (91.3m AOD)
- 1 Ropemaker Street (139.2m AOD)
- 25 Ropemaker Street (109.4m AOD)

163. In this context, the proposal would fit into an established context of tall buildings, with the western section of the proposals rising to under 100m at its highest part.
164. In relation to London Plan Policy D9(C;1; a; i) the impact of the proposals upon the City and wider London skyline in long range views has informed the optimisation of the site and the overall height and form of the proposed tall

building. In relation to long range views, these have been tested extensively in the THVIA including assessment of LVMF 8A.1 and 16.B2, as indicated in views 1,2 and additional views along the riverbank and bridges indicated in views 2.1,2.2, A5-A16. Some of the objections from statutory consultees relate to impacts shown in Views 2.1,2.2 and A16. These impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report. Views from neighbouring boroughs and all other relevant LVMF viewpoints have also been included within the Appendices of the THVIA.

165. In baseline and cumulative distant panoramic views including the London Panoramas defined by the LVMF, the proposal would be largely occluded by other buildings with only a very distant glimpsed, incidental presence where the uppermost storeys are partially visible. In all cases where visible, the proposals are perceived below the prevailing heights of the existing tall buildings in the City, preserving the character and composition of these distant views.
166. Within LVMF 8A.1, the cumulative scenario shows the proposals would be screened by the implemented extensions to the Grade II listed IBM building in LB Lambeth, and existing and implemented development including City Place House at 55 Basinghall Street. As such no harm to the characteristics or composition of this view is considered to arise. This view has been further tested with a telephoto lens, confirming the proposals would not be visible in this view.
167. In baseline and cumulative river prospects, the visibility of the proposals has been tested extensively. Within LVMF 16.B2, the proposals would be obscured by the silhouette of the Cathedral. This view has been further tested with a telephoto lens, confirming the proposals would not be visible in this view.
168. In views from the river and bridges including Views A5-14, the proposed development falls below the prevailing City skyline and is screened from view. Views 2.1, 2.2, A15 and A16, show a very small proportion of the proposals to be visible in views from the South Bank, in the case of 2.1, 2.2 and A16 resulting in a fleeting minor erosion of the extent to which the Cathedral is seen against open sky. Objections from the Surveyor of the Fabric of St Paul's and some other consultation responses relate to this view, and the impacts are acknowledged by Officers and discussed in extensive detail in the Strategic View and Heritage sections of the report. In this respect, in relation to long range views, the development would therefore result in a slight conflict with Policy D9(C; 1 a; i). As highlighted in these sections, the adverse impact arises chiefly in relation to only a 19m stretch of an over 2km river walk, with the overwhelming majority of river views preserved with regard to the skyline and local strategic views.
169. Local and mid-range views of the proposal (D9 (C1; a; ii & iii)) have been tested in the TBHVIA at Views 3 to 16. Objectors have raised concerns about the impact

of the scheme in these views both in townscape and heritage terms, regarding impacts to the compositional clarity of the Barbican Estate; not conforming with the prevailing shoulder heights along Moor Lane; and adversely impacting views from Willoughby House. Officers do not agree with these conclusions, as outlined below.

170. Through the application process, local views have been extensively scrutinised and particular consideration given to the views out of the Barbican Estate, especially the vantages from the highwalks and the public spaces around the Arts Centre complex. This has informed the detailed design of the proposals, noting that Historic England has raised no objections with regards to the impact to the Barbican Estate.
171. In views east from within the Barbican Estate, the proposals would be perceived as part of a group of contemporary developments along Moor Lane. In these views, the upper parts of City Point and 21 Moorfields add to the sense of a layered contemporary architectural character beyond the Barbican's eastern boundary. In the existing scenario, these contemporary developments backdrop the silhouettes of many of the key buildings of the estate, including the Barbican Centre (View 3) as well as Brandon Mews and Willoughby House (View 4). In these views the clearly defined material palette of the Estate and its characteristic sculpted concrete forms ensure that the Barbican remain easily distinguishable from the later developments beyond its eastern boundary. As such, within these views, the proposals are seen as an addition to existing contemporary development along Moor Lane, with the upper portions of the proposals intermittently visible from within the estate in locations where directly west of the site boundary, indicated in the ZTV. While this would create a change in views west from within the estate, it is considered this change would not alter the character of these views in which a number of contemporary tall buildings are partially glimpsed above the roofline of Willoughby House and the Barbican Centre. The proposals would fall below the roofline created by City Point, and is comparable in height to its neighbours. Equally, in both views sky gaps remain between City Point and the proposals, avoiding the creation of singular horizontal mass above the roofline. In views of the Barbican Estate from the east of the site (View 14), the upper most floors of Shakespeare Tower are glimpsed. While the proposals would slightly reduce the visible extent of the tower, the partial and fleeting nature of this glimpsed view reduces its overall townscape quality, contributing little to an appreciation of the Barbican's wider architectural character.
172. In views 7 and 8, the proposals are seen in the backdrop, appearing above the roof line of a group of listed buildings at the junction of London Wall and Moorgate, as well as those that complete the western extent of Finsbury Circus. In both cases the top of the proposals would be partially visible, backdropped or obscured

by existing contemporary development to the north and south, and by leaf cover in the case of View 8. The character and composition of these views is not considered to change, with the proposed building seen as part of an existing group of contemporary tall buildings.

173. In views along Ropemaker Street (Views 10-12) the proposals are seen as creating a new façade to City Point Plaza. The character of the Proposals would appear appropriate to the prevailing contemporary architectural character of the plaza, applying a grid design principle to the main elevation so that the façade appears calm and ordered. The proposals have been designed to respond to and enhance the civic quality of the open space within the plaza. The proposals, including the proposed landscaping and lowering of the plaza to create a level access entry from Moor Lane and Moorfields, would enhance this civic quality of the open space through the human scale of the grid design, active ground floor, planting, and pedestrian prioritisation.
174. The proposals are designed to centre on direct views south within the plaza - its massing tallest at the centre where it addresses the public space, before dropping in height to the east and west to adhere to the prevailing shoulder heights in the immediate locality. As such, the proposals are considered to mediate between the existing architectural elements of the plaza and is a complimentary addition, sympathetic in terms of townscape heights and massing. The proposed scale is considered characteristic of the established urban environment around the plaza, establishing with the location of the taller elements creating a sense of hierarchy and composition.
175. Similarly, the introduction of a more refined bay design, and subtle colouration with the addition of timber and greening, is considered to positively integrate with the existing palette of materials in the locality. The timber and planted elements are considered to add interest and relief from the existing hard landscaping of the square, whilst the use of a strong grid to the façades ensures the building is sympathetic to the existing elevation treatments which front onto the plaza. Similarly, the activation of the ground floor is welcomed, aiding a sense of place which remedies the slight anonymous and backland character to the immediate site surroundings.
176. In other north south views along Moorfields (Views 13-16) the development would be seen to activate the frontage to Moorfields and New Union Street. The proposed shop front would emphasise a pedestrian scale and character. Improvements to the vitality of the site in particular is created through the works to New Union Street, with additional shelter and considered lighting design proposed.

177. As such, the proposal is considered to make a positive contribution to the local townscape in terms of legibility, proportions and materiality, having a direct and positive relationship with the street and would be of an appropriate scale. The proposals are therefore in compliance with D9 (C1; a; ii) and D9 (C1; a; iii).
178. In relation to D9 (C1; b), the proposal would reinforce the spatial hierarchy of the locality, providing a new civic emphasis on the open space of the plaza and aid legibility and wayfinding through the concentration of height to its southern end. The designs seek to bring together the various contemporary architectural treatments currently surrounding the plaza through the application of an ordered façade design which fosters a sense of harmony with the neighbouring buildings. The proposals include significant improvements to the public realm, with welcoming and sheltered pedestrian movements encouraged by sensitive landscape intervention across the plaza. This includes the removal of the existing ramp and split level of the plaza to create a continuous surface, as well as the set back of the upper storeys along the northern façade, creating sheltered passage below. The proposed new frontage to City Point Plaza to the northern elevation would further enhance a sense of specificity and identity to the open space's southern edge, aiding wayfinding and legibility.
179. Accordingly, the proposal would comply with D9 (C1; b).
180. In relation to architectural quality and materials (D9 (C1; c)), the scheme seeks to set new standards within the City environment using an innovative hybrid structure incorporating timber joists supported by an exposed precast concrete frame. The timber joists, timber framed windows and timber vents would reinforce a softer appearance from the public realm. To note, the mass timber components have been designed in compliance with the Structural Timber Buildings Fire Safety in Use Guidance, Volume 6 – Mass Timber Structures; Building Regulation Compliance B3(1). A complete description and assessment of the proposed buildings and public spaces is given in the 'Architecture and Urban Design' section of this report. In this respect the proposal would comply with D9 (C1; c).
181. In relation to D9 (C 1; d) a full assessment of impact with regards to heritage assets is detailed in the Heritage section of the report. Officers have identified a slight, very minor level of less than substantial harm to the significance of St Paul's Cathedral, through the proposals' slight encroachment into the clear-sky silhouette of the pediment. Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved.
182. Comments have been received from the Surveyor to the Fabric of St Paul's and Historic England. These are discussed in the relevant sections below. For the reasons set out in detail in this report, it is considered there is clear and convincing justification for the proposed development. The development optimises the

capacity of the site, over and above the consented scheme whilst also transforming the streetscape to City Point Plaza and Moorfields, ensuring the quality of urban realm sufficiently reflects the transformational arrival of Crossrail and dramatically improving the extent of accessible inclusive open space in this important gateway location. To secure these benefits, alternative proposals have been explored including the previously consented scheme and the iterations to the scheme since submitted to arrive at an optimal balance, including reduction in height and amendments to the design to refine the presence of the proposals in relation to the setting of St Paul's Cathedral. Officers have further concluded that the scheme would deliver public benefits which would outweigh the slight harm caused. As such, the proposal would comply with D9 (C; 1; d).

183. In respect of D9 (C1; e), the proposal would not be visible in relation to the Tower of London World Heritage Site. The development site is not located within the local setting of the WHS and the Zone of Theoretical Visibility (ZTV, TVBHIA Appendix C) shows that there would be no intervisibility between the proposed development and the WHS.
184. In respect of D9 (C1; f) the application site is set well back from the banks of the river and is outside the Thames Policy Area. The proposal would have no impact on the surrounding scale, open qualities and views of the River Thames and not contribute to a canyon effect along the river, in accordance with D9 (C; 1; f).
185. In respect of D9 (C; 1; g), the proposal is not likely to cause significantly adverse reflected glare, as is set out in the solar glare section of this report. Detailed solar glare assessments post-completion would be secured through a S106 obligation. Further details of materials to ensure protection from solar glare would be submitted by condition to ensure compliance with D9 (C; 1; g).
186. In respect of D9 (C; 1; h), the potential light pollution impacts arising from the proposed development have been assessed and are set out within the Light Pollution section within the report. The proposal has been designed to minimise light pollution. This was a specific consideration, especially in views from Willoughby House where there would be an insignificant change at night compared with the existing situation. A condition has been included which requires the submission of a lighting strategy to be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. These would be provided and assessed as part of the relevant condition in order to mitigate the scheme's impact, particularly on residents. The proposal would comply with D9 (C; 1; h).

Functional Impact

187. Through the pre-application process and consultation, the internal and external design, including construction detailing, materials, and emergency exits have been designed to ensure the safety of all occupants, and these issues have been covered in more detail in the fire safety, suicide prevention, security, public access, inclusivity, noise and vibration, and transport sections of this report. The buildings are not of a height to interfere with aviation, navigation, or telecommunications equipment. This is equally the case for any tower cranes associated with the construction of the buildings. The buildings would not have a significant detrimental effect on solar energy generation on adjoining buildings. The proposals are considered to be in accordance with London Plan Policy D9 (C; 2; a-f).

Environmental Impact

188. The proposals have been found to provide safe and suitable levels of wind, and daylight and sunlight and temperature conditions would not compromise the comfort and enjoyment of the proposed new open spaces, when landscaping is provided. These are addressed in the daylight, sunlight and overshadowing, wind, thermal comfort, and noise and vibration sections of this report. Further details of the external materials would be provided by condition in order to ensure safe and comfortable levels of solar glare and solar convergence. Additionally, the design has given consideration for how the proposals can assist with the dispersal of air pollutants and would not adversely affect street-level conditions or create harmful levels of noise from air movements, servicing or building uses (see noise section of this report for further details), preserving the comfort and enjoyment of surrounding open space. It is considered the proposal would meet the environmental considerations of Policy D9 (C; 3; a-c).

Cumulative Impacts

189. Where relevant the cumulative visual, functional, and environmental impacts of proposals have been considered throughout the design development, and assessed within their relevant sections, noting that the scheme did not require an EIA. The proposal would comply policy D9 (C; 4a).

Public Access

190. The provision of a high-level, free-to-access viewing gallery as required by Policy D9 (D) was not felt appropriate in this location due to its proximity to nearby residential properties and the greater potential for overlooking from a public terrace, which are often open outside of office hours. Officers consider that the overall provision of and improvement to City Point Plaza as well as the creation

of a community hub at ground floor facing onto the plaza sufficiently offsets the lack of high-level viewing gallery in this instance; the proposal would therefore comply with D9 (D)

Tall Building Conclusion:

191. Overall, it is the view of your Officers that the site is considered to be appropriate for a tall building and is a strategic delivery site complementing existing tall buildings in the City and the City Cluster.
192. As a matter of planning judgement, it is considered that the proposal would accord with London Plan Policy D9 A, B, C (1:a:ii-iii, b, c, d, e-h, 2-4) and D, Local Plan Policy CS14 (1, 2, 3 and 4) draft City Plan 2040 S12 (1, 3, 4-7, 8:b,d-e,9, 10:a,c-k), S13 (1,3-4).
193. There is some minor conflict with London Plan D9 C (1:a:i) and draft City Plan 2040 S12 (2,8:a&c,10:b) and S13:2 due to the minor, adverse impact of the proposal on the South Bank views described above. These impacts are identified below and addressed through the report. These conflicts with Development Plan policy are addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the planning balance.

Architecture, Urban Design and Public Realm

Architecture

Siting, context and optimisation

194. The proposals seek to secure a significantly improved offer from the 2020 consented proposals. Located at an important transport hub and nearby the cultural anchor of the Barbican, the proposed scheme seeks to optimise capacity for growth in accordance with policy D3(A&B) of the London Plan, and meet the targets set out in S4 of the 2040 Draft City Plan for office floorspace, in an area undergoing transformation following improvements to Moorgate Station and the arrival of the Elizabeth Line. The scheme would deliver important enhancements to City Point Plaza, an key open space in the northern half of the city, currently undermined by the lack of step free access. Proposed landscaping, creation of level access and improvements to a sense of hierarchy and place to the plaza would elevate this space to become a key civic amenity that is suitable given its location close to this key arrival point, reinforcing a sense of identity, legibility, permeability, and inclusivity. The site is therefore considered appropriate location for an optimized capacity for growth, in compliance with London Plan D3(A&B) and CS 10(2).

190. The development proposals have evolved throughout the pre-application process, using a design-led approach that optimises the site capacity to accommodate significant growth, whilst improving architectural quality. Core CAZ activities would be intensified as a result of the proposals, including employment, complementary commercial and community uses, through the provision of a new community space at grade facing the plaza, which would be further enabled by a significant increase in the quality and inclusivity of public spaces and routes in the immediate site surroundings creating a healthy, diverse, and reimagined place. It is considered that the scheme would represent 'Good Growth' by design, in accordance with the London Plan Good Growth objectives GG1-3, 5 and 6 growth which is socially, economically, and environmentally inclusive.
191. The development would deliver a design solution which makes effective use of limited land resources in accordance with Local Plan Policy CS10 and emerging City Plan 2040 policy S8 and S6.1.

Present Site Condition and Context

192. The site is located in an area which has evolved considerably in the late twentieth century, following the post-war rebuilding to the northeast of the City, with later adaptation and expansion in the 1990s and new Millennium. Following post-war site clearance, Tenter House, Moorfields House, City Point (then Britannic House) were constructed throughout the 1960s. The three buildings completed the southern, western and eastern sides of the plaza, and were connected at below ground level under the plaza. By 1970 the buildings and plaza formed a distinct modernist development, with tightly defined inward-facing, geometric forms framing each side of the plaza, which itself provided a large, stepped area of open ground and hard landscaping including ponds.
193. Late twentieth century works to City Point to the northeast of the site created a substantial ground-floor galleria, curtailing the extent of the public realm in the plaza and its open quality as well as the loss of earlier hard landscaping including the ponds. These works have left the character of the plaza as a fragmented open area, with no clear sense of architectural hierarchy to the surroundings. The development was always inward looking, with the raised levels across the plaza creating a lack of permeability and service routes pushed outwards to Moor Lane, Moorfields and New Union Street to the west, east and south respectively. Wayfinding across the plaza is therefore compromised and confusing, diminishing the potential benefits such a large area of open space could bring.
194. Following the implementation of the 2020 consent, the demolition of Tenter House and works to clear the site are currently underway and is due to be fully cleared to ground by January 2025. To the south, the improvements to Moorgate Station and arrival of the Elizabeth Line have transformed footfall and the character of

Moorfields from a narrow secondary route to an important urban hub. The plaza is presently divorced from this hub through a lack of clear sight lines and routes from Moorfields, with the present route through including steps and crossing the off-putting open void of the vehicle ramp. This underwhelming entry point defines the access to the main eastern side of the site fronting onto the plaza and creates a significant barrier to the site's usability, notably undermining the quality and potential of the consented 2020 scheme. The location of New Union Street, a service lane accessing below ground car parking which also fronts onto Moorfields exacerbates this existing character, creating an overall 'back-land' quality either side of the Site's elevation to Moorfields. The utilitarian appearance of New Union Street is off-putting in terms of pedestrian safety, perceived as a service route and undermining the potential of this east-west route from Moorfields.

195. To the west, the entire western boundary to the plaza is occupied by the expanded City Point, including covered western pedestrian entry into the plaza. Further west, the Heron residential development almost equals City Point in terms of height, whilst further south the eastern limits of the Barbican Estate including Willoughby House create a distinct change in character. The significant height and extent of the City Point complex creates a substantial experiential barrier between the plaza, the Site and Moorfields, and the wider Barbican Estate.
196. In summary, the site surroundings and particularly the plaza is overwhelmingly characterised by the considerable extent of hard landscaping at ground floor. There is a general sense of anonymity, with routes through to the surroundings streets and wayfinding across its extent unclear, exacerbated by the lack of level entry access onto the plaza itself and ongoing visibility. In general, the buildings facing the square are experienced as isolated architectural episodes rather than part of a whole composition. While the consented proposals would create a change to the interior of the building plot, these works would not resolve the poor connectivity into the wider urban environment and lack variety of offer at street level or to the plaza, and lack an appropriate level of activation given the transformed importance of Moorfields. The entry into the plaza from Moorfields is particularly egregious, with a large below ground vehicle ramp subdividing the pedestrian route through into the plaza. The consented scheme also makes use of outdated revolving doors to Moorfields which are no longer considered acceptable in inclusive access terms. A diminished sense of place to the plaza is exacerbated by the lack of diverse uses surrounding the square with little ground floor activation and public permeability.

Design Principles

Height, Form and Massing

197. The development vision has evolved and is based on the fundamental characteristics of modern placemaking enshrined in the NPPF and the National Design Guide. The layout and built form would respond to metropolitan and local contexts, and the overall character of the proposal seeking to improve public permeability, activity and sense of place to the plaza. The proposals seek to address the flaws of the existing condition and consented scheme as outlined above, with a responsive design which reflects the renewed importance of the frontage to Moorfields, following the arrival of the Elizabeth Line to Moorgate, as well as the civic importance of the plaza itself. The siting of the tall building in this location is therefore seen as appropriate to its local context, sitting comfortably with comparable developments to the western side of Moorgate and surrounding the plaza, with the height of the surroundings and established characteristic of the plaza since the post-war period, whilst optimising office capacity. The proposals are comparable in height and sit within an established hierarchy of tall buildings including City Point Tower and 21 Moorfields.
198. The massing has been organised to create a central emphasis in the elevation to the plaza, concentrating height to the middle of the plot whilst simplifying the number of volumes in comparison to the consented scheme, reducing from five to three, including a small inset between the eastern lower volume. The strong central emphasis creates a sense of considered order and hierarchy, establishing a strong architectural identity to views south within the plaza. The setbacks and positioning of the upper storeys have been arranged to avoid impacts upon distant LVMF views 8A.1 and 16B.2, which fall to the southeast of the site. Equally, the proposals step down to meet the shoulder line of new developments on Moor Lane and Moorfields. There is a generous roof terrace at 14th floor, allowing for mature tree planting, further adding to the urban greening of the site visible at a distance and creating a set back to the upper levels.
199. The building would rise to +95.25m AOD to the top of the 21-storey element, and to +71.55m AOD to the top of the balustrade to the 14-storey element. The building would rise to 81.2m AGL. The proposals as originally submitted were for a ground-plus-21 storey building at +99.9m AOD, but this was reduced during application stage as addressed in the Design and Heritage sections of this report.
200. The massing fundamentally adheres to the principles of the 2020 consented scheme, whilst acknowledging that the proposals reflect an increase in height to the both the Moorfields frontage and to the tallest elements. With regards to its siting, height, form and mass, the proposals are seen as contextually appropriate at a local townscape level, and conforming to an established context of new development along Moor Lane, whilst taking opportunities to remedy elements of the public realm. The proposals reinforce the sense of place and urban character by reinforcing building lines to the plaza and defining access onto the open space,

creating an improved permeability to the urban grain which would dramatically enhance a welcoming, equitable and inclusive character to the area.

201. Minor amendments to the submitted scheme have been undertaken following an identified distant visibility of the uppermost levels of the proposals from the South Bank which, do not impact the protected views identified within the LVMF, but were found to have an adverse impact on kinetic views of St Paul's Cathedral, diminishing the contribution of setting to the significance of this Grade I designated heritage asset. The amendments have therefore reduced the height of the proposals by 4.66m, removing a storey and re-arranging plant and addition of greening so that the visibility and impact of upper level of the scheme in these views is substantially reduced. The impact on St Paul's is discussed in more detail below.

Detailed Design, architectural expression and materials

202. The detailed façade design has sought improve the bay design of the consented scheme, celebrating the use of timber elements to the structure which are revealed in the external window surrounds. The use of timber in the façade provides a welcome softness which further relieves the hard character of the plaza. The structure, a hybrid system which combining timber joists within an exposed precast concrete frame, is purposefully legible, creating an integrity and simplicity to the external architecture, allowing for a calm and ordered approach which priorities harmony. The internal structure is therefore readily appreciable and expressed in the exterior façade, resulting in an elegant simplicity to the external appearance, which appears consistent with glimpsed interior ceilings. The textures and grain of both the pre-cast concrete and timber elements are the key expression of the architecture, with the simplicity of the exoskeleton grid structure allowing this texture to lead the look and feel of the elevations.
203. The 'grid' system to each bay design also creates a balanced appearance around the plaza appearing complimentary to the modernist principles of Moorfields House, the only unaltered building of the original BP scheme, as well as the glazing of City Point.
204. The external materials are designed to reflect the structure, comprised of oak vertical inward opening timber window panels and inner window reveals, a slim brushed aluminium window frame with pre-cast concrete for the overall grid, window spandrels and planters. This exterior façade treatment would be seen alongside glimpses of the structural timber Gulam beams and pre-cast concrete columns, creating an overall harmonious finish with a distinct feel and grain. The final finishes and quality are to be secured via condition to ensure durability and resistance to weathering and wear.

205. The approach to integrated lighting has limited to a subtle emphasis on the building hierarchy, focusing on entrances and green elements, highlighting the use of timber. The final lighting scheme is to be controlled via condition to avoid light spill onto neighbouring properties or adverse impact on residential amenity.

Elevational treatments

206. The geometric grid bay design is applied to each elevation, including the lower and upper volumes, creating a sense of continuance and order to the scheme as a whole, with adjustments to the depth of enclosed space to each elevation to create a sense of rhythm and hierarchy. The principal eastern, western and southern elevations push the grid form of each elevation, inseting the enclosed mass, to create an 'exoskeleton' which allows for additional hanging greening. This includes balconies to the eastern Moorfields elevation, which aids a softer appearance and sense of permeability and activity appropriate to this important route. Additionally, the exoskeleton around the western lower volume ensures an additional set back of the window line from outward views from the Barbican Estate. The extent of planters and greening to the facades is a considerable improvement above the consented proposals, which adopted an overly glazed and impermeable character, which Officers consider lacks the proposed nuanced and textured architectural character of that now proposed. The overall urban green factor of the proposals is higher at 0.54 (inclusive of plaza works), in comparison to 0.36 for the consented proposals. The exoskeleton approach also offers integrated solar shading to the interior. The overall approach is considered to be detailed and visually attractive, improving on the consented scheme.

207. A further inset continuous bay of planters is positioned at the transition on the northern elevation fronting the plaza on entry into the full extent of the open space. This responsive approach reemphasizes the importance of the plaza and centres the northern elevation to create a sense of focus and hierarchy whilst adding to the green soft character of the façade. The northern elevation also features substantial columns at ground, rising three stories to give the principal building entrance gravitas, and acknowledging the importance of the plaza façade through the single break in the grid structural form. This break in the grid reveals the full extent of the timber supports, which create soft verticals to the lower three storeys of this elevation and aids a sense of rhythm.

208. The lower levels of the western elevation are screened from view by the full extent of the City Point development. The use of the exoskeleton and planters wraps the northern western corner, continuing for three bays before the façade line recesses to reflect the inset site boundary, and the prevailing grid design is continued. The majority of the southern elevation adjoins 21 Moorfields and is therefore left blank, aside from the projecting western volume noted above, the

upper volume above the 14th floor terrace and final eastern seven bays of floors 12 and 13.

Streetscene

209. Complimenting the significant improvement works to the plaza, outlined in full under the urban design section below, the proposed new urban frontages consistently deliver a high quality and active streetscene, that improves upon the consented proposals. The proposals include the full extent of the frontage to Moorfields given over to a restaurant, creating a vibrant, active and permeable ground floor where adjacent to Moorgate Station, creating additional natural surveillance. This use is sheltered by the cantilevered third floor, whose height allows the open quality at street level to remain. Provision for signage has been incorporated into the elevation, with the proportions and placement reflecting a human scale. Attention has been paid to the soffit of the cantilever, using timber to create an inviting warm presence at street level and offer visual relief from the hard surfaces in the urban environment. This active use would be complimented by the commission and installation of public art to New Union Street, secured as part of the Cultural Strategy and through condition, creating an inviting and diverse offer at street level, drawing footfall north towards the plaza and alleviating the back-land quality of New Union Street.
210. To City Point Plaza, the use of columns creates a sense of hierarchy which responds to the important open space of the plaza, with projecting third floor allowing a sheltered route north-south. The colonnade length reinforces the horizontal open extent of the plaza, enhancing the clarity to the building line, and bringing a sense of order to what is presently experienced as a fragmented space, as well as defining the limits to the office use. Further activation is created with the provision of a community space, with a dedicated entrance and plaza frontage. Provision for specific and separate signage for the community space has also been incorporated into the design, with a clear legibility to the range of public and private environments. As with the eastern elevation, the use of timber and greening is considered to rehabilitate the southern end of the plaza as existing whilst offering a much more responsive, diverse and generous façade than that of the consented scheme.
211. The approach to servicing has been integrated throughout, and designed to minimise effect on the street scene appearance by prioritising less prominent locations and avoiding monocultural uses. Subsequently the use of louvres is limited to the western interior of New Union Street and the screened section of the western elevation as well as at roof level. The eastern end of New Union Street remains as exit only for vehicular traffic which, along with the improvement works to New Union Street, would prioritise pedestrian permeability.

Interior and Ground Floor Design

212. The floor plans and design to the interiors are considered to be high-quality and reflect the wholesale activation of the ground floor, with a diversity of uses that optimise the site for engagement with diverse communities and occupiers. The openable windows encourage a healthy inclusive working environment which prioritises comfort, and a tactile welcoming environment. The layout of the office floors is considered flexible and inclusive, whilst allowing passive ventilation. It includes provision for a restaurant to Moorfields, recognising the important point of access from pedestrian traffic from the station into the plaza. Enlivening of the plaza is also realised through the creation of a coffee bar within the office reception, as well as a separately accessed community space to the west, with its own dedicated accessible WC and storage space. The scheme is a dramatic improvement upon the consented scheme which prioritised the office use at ground floor, which remained unaligned with the open extent of the plaza. While a retail unit to the plaza was originally included prior to the scheme amendments, its position at ground floor was not best placed to make use of foot traffic from the station, leaving the entry into the plaza as backland area. Similarly, the provision of accessible ground floor WCs is tripled from the consented proposals, with an overall increase from one to six ground floor WCs in total. Equally, active travel and provision for cyclists has been prioritised, again improving against the consented scheme by 161 net spaces.
213. As above, the proposed treatment to New Union Street is considered an improvement upon the consented scheme, which prioritises pedestrian movement, encouraging a welcoming character through the use of quality paving, considered lighting and decorative detail to instil a human scale, whilst retaining below ground level access to a loading bay. New Union Street is proposed as a location for public art and the Cultural Strategy sets out the strategy to bring this to fruition, as secured through S106 obligation.

Roof terrace, balconies and upper levels

214. Barbican residents and amenity groups have raised concerns regarding the impact of the terraces regarding overlooking.
215. The terraces at 14th and 19th floors and balconies to the east have been designed in accordance with policy DM 10.3 in mind, having regard for neighbourliness, and are sympathetic to the prevailing contemporary architectural character of the surroundings. The design of the balconies and terraces are integral to the overall architectural approach, utilising the grid as the basis for the balustrades, so that they form a consistent sympathetic whole, whilst ensuring appropriate amenity for the occupiers. The incorporation of planting and trees to the elevations, including a continuous stretch of planting and greening, with a focus on trees to the terrace

at 14th floor which together with the green roof promote a biodiversity throughout the building, whilst remaining safe and secure, and providing important amenity and respite. Timber benches are incorporated into the curved 200m raised planters to allow flexible and accessible seating, with limestone paving to the floor surface. The detailed design of these elements would be secured via condition, to ensure quality and safety.

216. As outlined above, the scheme has amended the design of the upper volume, lowering the height by 4.66 meters, including the reduction of the height of the roof plant parapet. Photo-voltaic solar shading in the form of a brise soleil has been added to the south facing windows. At the 19th floor, a series of horticultural wires, set away from the façade, provides an armature for evergreen climbing plants to provide further screening in the distant views from the South Bank noted above, as well as screening the proposed louvres to the plant area. The plants have been intentionally selected for reduced fire risk, and integrated fire proofing is also proposed. The roof level includes a substantial green roof, as well as housing for the BMU.

Summary

217. Overall, the proposal would optimise the use of land, delivering a high quality, mixed-use building, and reinforcing a renewed sense of place to the plaza and Moorfields. The architectural response is considered to be thoughtful and would positively transform the plaza and reconnect the site into the surrounding urban realm, using a responsive approach. The proposals would pay attention to sustainability and microclimate, whilst creating a welcoming and inclusive environment at both street level and the interior, demonstrably improving upon the consented proposals. The urban greening, timber architectural expression and activation at ground level, including the prominent siting of a community space facing the plaza, are particular benefits over and above the permitted scheme. The architectural character, through its calm, ordered and tactile appearance is engaging and distinctive, improving upon the now dated appearance of the consented proposals. The bulk, height, massing and quality of materials and design approach would be appropriate to the character of this part of the City, whilst aspiring to a softer green articulation appropriate to the future ambitions of the City. The proposal would constitute Good Growth by design and would comply with National Design Guide policies, Local Plan design policies CS10 and, DM10.2 and DM10.3, emerging City Plan policy S8 and DE2 and London Plan DE3 and DE4, contextualised by its Good Growth objectives GG1-6).

Public Realm

218. The design for the public realm seeks to improve connectivity, wayfinding, and sense of place to the plaza, reconnecting the site and open square within its

surrounds. As such, optimising the ease of pedestrian movement has directed the development of the proposals, improving the extent to which the plaza provides a continuous easily accessible open space, enhancing its civic qualities.

219. The proposals are in line with best-practice in Urban Design and Placemaking. The layout of the ground plane with its arrangement of routes, spaces and uses would rehabilitate the plaza which in the immediate context of the site. As outlined above, the site is presently experienced as a backland area, not commensurate with its position around the important public realm of the plaza. Fundamentally the proposals would instil a sense of place and welcome appropriate to the sites gateway location from Moorfields into the plaza.
220. The significant greening of the elevations, over and above the 2020 consented scheme, is matched by planting proposals to the plaza itself. Specifically, the design has sought to encourage dwell times within the plaza, which combined with the proposed active uses at ground floor, would draw footfall from Moorgate Station. This is considered to encourage further activation of the square and establish a civic character, emphasising a broader pedestrian and cultural desire line from the Liverpool Street Station in the east to the Barbican and Guildhall School of Music and Drama in the west.
221. The proposals would comply with Policies D3, D8, T1 and T2 of the London Plan 2021, as well as CS10, CS16, DM10.1, DM10.4, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies S10, AT1, S8, DE2, DE3 of the emerging City Plan 2040, and, the City of London Public Realm SPD and the City Public Realm Toolkit. The creation and/or improvement of new and existing public spaces and routes is considered by officers to be an important benefit of the scheme, and represents an improvement from the 2020 permission.

Layout and disposition of buildings, uses and public spaces

222. The chief intervention into the plaza is the removal of the existing car park ramp at the entry into the plaza from Moorfields, creating a welcoming gateway into the plaza, with footfall encouraged by the placement of mature trees and raised planters with incorporated seating. The approach offers moments to sit and dwell whilst also facilitating wayfinding by allowing clarity to accessible routes directly west across the square to Moor Lane, sheltered by the projecting upper floors of the northern elevation of the proposed building. The detailed design of the seating would be controlled by condition, to ensure these are safe and welcoming for all users include those with additional access needs. The clarification of desire lines improves the existing condition of the plaza which, due to the existing ramp and split levels, makes routes through to the surrounding streets difficult to perceive. The removal of the existing Pret a Manger structure and reworking of the junction

between the proposed building and City Point would enable this greened space to be enjoyed with views across to the full extent of the plaza to north, adding to the sense of openness. Fundamentally the removal of the ramp and raised platform within this location significantly improves the accessibility and permeability of the plaza. Further assessment of the accessibility benefits of the scheme are outlined within the 'Access and Inclusivity' section below.

223. Further emphasis to the buildings northern entrance is given with raised planters and mature trees, creating a sense of composition to the northern façade and southern termination of the square in views across the plaza from the north. This is considered beneficial to the wider enjoyment of the plaza itself, encouraging a sense of respite and leisure within the open space, which is in accordance with the frequent activation of the square with public art (curated by Brookfield as owners of City Point Plaza).
224. The improvement of pedestrian priority along New Union Street is also welcomed, with improved lighting and shelter to encourage permeability. Public art is also proposed as part of the lighting installation and culture strategy, creating a sense of activation which remedies what is currently a dark and off-putting side passage. This aspect of the proposals is in support of the Culture Mile BID and wider aspirations to provide connectivity between Liverpool Street and the Barbican/Smithfield 'area of change'.
225. The selected palette of materials for the proposed landscaping conforms to the CoL paving standards, matching the existing paving within the plaza. New Union Street is proposed to be paved with granite sets, with the footpath utilising Yorkstone. Full details are reserved by condition as New Union Street is private highway and City Point Plaza is permissive path/designated Open Space (see Transport section below).

Active frontages

226. The proposals would create activation along the ground floor, providing a community unit to the northern elevation at the entrance into the plaza from Moor Lane/City Point, as well as a restaurant fronting Moorfields. This would add a vibrancy to the southern portion of the square and improve the prior conditions of the site. This activation is also consistent with pedestrian routes from Moorgate Station to the south and is supportive of wider aspirations to link Liverpool Street with the Barbican/Smithfield Area of Change. These active elements would also now be entirely accessible, where stepped access presently exists.

Public realm, management, cultural and programmable events

227. The lowering of the plaza by 500mm would allow the entirety of the open area to be level, improving the capabilities for the plaza to play a bigger role in publicly accessible events. Further, the cultural strategy identifies an opportunity for cultural activity in the ground floor reception area, supported by the ground floor community use. As such, the publicly accessible ‘interiors’ at ground floor would complement the public realm.
228. Proposals for New Union Street include 139 meters allocated for a new ‘landmark’ public art commission running the length of the covered street within the applicants’ control. New Union Street would support the Culture Mile BID by enhancing the legibility of connecting routes between major surrounding cultural institutions - including the Barbican Centre, Museum of London, Guildhall School of Music and Drama and The London Symphony Orchestra.
229. The appropriate management, curation, and programming of the public realm, both internal and external, would be ensured via condition. A Public Realm Management Plan to be secured by condition would 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. Overall, the proposals appear to maximise public access through the provision of publicly accessible internal and external spaces; this is a very positive aspect of the proposals.

Transport related urban design considerations

230. The proposed servicing strategy would separate vehicle servicing access from areas of high pedestrian footfall or dwell spaces insofar as possible, allowing the public realm to perform a variety of functions without being disturbed by the presence of large vehicles. In addition, the existing car park ramp and below ground parking would be replaced, enabling the lowering of the plaza, level access across its extent, and new landscaping. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that would preserve safety and quality, without disturbance or inconvenience of the surrounding public realm, in accordance with London Plan (2021) Policies D3 (4) and D9. It is noted that the east west one way street to New Union Street is exit only, reducing vehicle traffic along its extent.
231. Hostile Vehicle Mitigation (HVM) has been sensitively incorporated in the public realm, through sensitive use of a mix of “softer” measures such as a HVM compliant planters including dense landscaping and tree planting, with a limited

number of bollards wholly on private land as opposed to public highway. The proposals are considered to be in accordance with City of London Local Plan (2015) Policy CS3.

232. Overall, the proposals would be accessible and welcoming to all, and would provide streets and public spaces which would dramatically improve the urban environment. Walking and cycling are the most sustainable transport modes, the proposals rightly prioritise them. The proposed development would enhance the streetscape in terms of attractiveness and functionality for those users, it is reachable from numerous public transport interchanges on foot, with good cycle lane provision in the vicinity and high-quality cycle facilities with prominent and legible entrances. The provision of cycle storage and parking in the basement would prioritise the needs of active travellers and provide high quality facilities to support and encourage active travel.

Greening

233. DM 10.2 of the Local Plan and S8(7) of the emerging City Plan and London Plan Policy G5 requires major development proposals to contribute to the greening of the City by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage. The proposals include provision of a substantial number of trees and planting across the site area. Urban greening is detailed further in the Sustainability (Urban Greening) section of this report. The proposed urban greening is well designed and contributes to the overall quality and character of the proposed buildings, and public realm and is considered to be compliant with London Plan policies D3, D8, G1, G5 and SI13, and City of London Local Plan (2015) Policies DM10.2, DM10.4, CS15, DM15.5, DM19.2 and emerging Policy S8(7) of City Plan 2040.

Materials

234. The proposed approach would seamlessly stitch the site into its wider urban context. The materials selected are considered to reinforce the public character of the plaza and New Union Street. At ground floor level, the use of York Stone, and Granite sets to New Union Street would create a consistency in the design and appearance of the adjacent streets and the public spaces. This would suggest to pedestrians that the space is publicly accessible in a welcoming manner, utilising the material palette and detail established in the City Public Realm SPD and the associated Public Realm Toolkit, with final detail reserved for condition. The materiality of the public realm and all associated furniture is considered to be acceptable; it is in accordance with Local Plan (2015) Policies DM10.1, DM10.4, London Plan (2021) Policies D3, D4 and D8.

Lighting

235. Lighting would play a key role in the success of the development, to keep people safe and secure, to contribute to placemaking and to enhance heritage. Initial concepts have a multifaceted approach, cognisant of residential amenity and sustainability to minimise obtrusive light as much as possible. The TBHVIA has also provided some nocturnal experiences including views 4N and 12N. The final proposals would develop the positive impacts of the lighting strategy, to realise social and ecological benefits. Initial concepts have been presented for the different character areas within the public realm. A final 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 the City of London Lighting Supplementary Planning Document (SPD) 2023, Local Plan Policy DM 10.1 and Draft City Plan Policies S8, DE3 and DE9, and with regard to impacts on heritage assets. The final design would deliver low level and architectural illumination which enhances the pedestrian experience.

Architecture, Urban Design and Public Realm Conclusion

236. The proposal amounts to a complex and high-quality piece of design in response to local and pan-London contexts. The proposals would constitute Good Growth by design and would be in accordance with Local Plan Policies CS10 and DM 10.1, emerging City Plan Policy S8 and DE2, London Plan D3 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-6. Various conditions are proposed to ensure that the promise of the proposals is fully realised at detailed design, construction, and operational stage in accordance with D3(12) of the London Plan and S8(14) of the emerging City Plan 2040.
237. Overall, it is considered the proposal would optimise the use of land, delivering high quality office space, offering a greater diversity and more active streetscape when compared to the consented scheme. The improved access, quality and extent of the plaza is substantive. It would improve the site's interfaces with and contribution to the surroundings whilst delivering a huge improvement on what should be a valued open area, closely located to an important transport hub. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy.

Views and Heritage

Strategic Views

238. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. These policies seek to implement the Mayor's London View Management Framework (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 S23 of the emerging City Plan 2040 seeks the same and takes into account the Tower of London World Heritage Site Management Plan (2016).

Tower of London World Heritage Site

239. The site is not located within the Local Setting of the Tower of London and the proposal would share no intervisibility with the World Heritage Site in any of the Representative Views identified in the LVMF or the Local Setting Study. The Zone of Theoretical Influence (TBHVIA Appendix C) shows that there would be no intervisibility between the proposed development and the WHS, including its local setting area.

London View Management Framework Impacts

240. The building is sited to avoid harmful impact upon designated Protected Vistas towards Strategically Important Landmarks (SILs), including St Paul's Cathedral and the Tower of London (ToL). The location of the development lies within the Background Wider Setting Consultation Area of Linear View 8A.1 Westminster Pier, and within the field of view of LVMF 16B.2 The South Bank: Gabriel's Wharf. While no visibility has been identified in these views, verified wireline views have been produced to provide certainty and assess the potential impact of the proposals upon these views. Comparison to the visuals produced for the consented scheme are also included within the TBHVIA where relevant and are assessed in detail below. Officers note potential harmful impacts to LVMF 16.2 and LVMF 8A.1 were referenced in objections received from the Barbican and Golden Lane Neighbourhood Forum. The assessment below seeks to provide clarity on these points.
241. Please note that while Historic England's consultation response referred to a visible impact in the 'approach' to 16B.2, Officers wish to clarify it is the spatially defined viewpoint and associated vista that is protected under the LVMF. Accordingly, the impacts raised by HE are discussed under assessment of local strategic views points and heritage assets below. For the avoidance of doubt, there is no visibility of the proposals within 16.B1 or 16.B2 as defined by the LVMF and its management guidelines.
242. It should be noted that the 'baseline' in this assessment is the existing scenario with the previous building on largely site cleared, in accordance with the legal implementation of the previous consent. It is not possible to represent that scenario in the photograph without significantly altering the images and therefore

an additional modelled image to show the fully cleared site is supplied throughout the TBHVIA, and this has informed officers' assessments.

243. With regard to other LVMF viewpoints, the development falls within the field of view of the following:
- View A1, LVMF1A.1 Alexandra palace.
 - View A2, LVMF 2A.1 Parliament Hill
 - View A3, LVMF 3A.1 Kenwood Viewing Gazebo
 - View A4, LVMF4A.1 Primrose Hill: The summit.
 - View 1, LVMF 8A.1 Westminster Pier
 - View A5, LVMF 13A.1 Millennium Bridge
 - View A6, LVMF 15B.1 Waterloo Bridge; downstream Westminster bank;
 - View A7, 15B.2 from Waterloo Bridge; downstream Centre of bridge;
 - View A8, LVMF 16B.1 The South Bank: Gabriel's Wharf;
 - View 2, LVMF 16B.2 The South Bank: Gabriel's Wharf
 - View A9, LVMF 17B.1 Golden Jubilee/Hungerford Footbridges: downstream – crossing the Westminster bank.
 - View A10, LVMF 17B.2 Golden Jubilee/Hungerford Footbridges: downstream – close to the Westminster bank.
244. Of these, in Views 1.A.1, 17.B1, 17B.2, 16B.1, 15B.1, 15B.2 and 2A.1 the proposals are entirely screened by development in the baseline conditions. Within views 13A.1, 4A.1 and 3A.1 there would be very partial glimpses of portions the uppermost levels of the proposals, seen below the prevailing horizon line created by existing development. These glimpses were not found to engage any of the visual management guidance within the SPG for each view, and while partially visible, would not constitute a change in the baseline character of each view and, accordingly, it is considered that the proposals would not have an impact on these views and are therefore not assessed further in respect of them.
245. Regarding View 1 LVMF 8A.1 (Westminster Pier) and View 2 LVMF 16.B.2 (The Southbank: Gabriel's Wharf), the proposals have been demonstrated, including with a telephoto lens, to be totally occluded by either a recently implemented scheme or the Cathedral itself. As such the proposal would have no impact on these views.
246. As such, the proposal would have no impact upon the relevant LVMF Assessment Points and would therefore preserve the setting of St Paul's as the Strategically Important Landmark in LVMF views. The proposals are therefore in accordance with Local Plan Policy CS 13(1), draft City Plan 2040 Policy S13 and London Plan 2021 policy HC4 and guidance contained in the LVMF SPG.

City of London Strategic Views

St Paul's Heights – Viewing Points:

247. Kinetic views of the Cathedral from the south bank are identified within the Protected Views SPD, falling under the 'St Paul's Heights' policy and

implemented under CS13 of the Local Plan. The policy comprises two parts, firstly an overall height threshold within a defined geographic area known as the 'St Paul's Heights Policy Area' (Figure 4) and secondly a series of local views of the Cathedral from the Thames bridges, certain points to the north, west and east, as well as an approximately 1.92km stretch of the Southbank identified in Figure 3 of the SPD. As defined in paragraph 2.17 of the SPD, the function of these defined views is to protect the Cathedral's backdrop and skyline setting.

248. As described within the SPD, views across the riverside and bridges towards the Cathedral form a continuous and extensive kinetic experience, where the visible extent and degree to which the Cathedral's silhouette is seen against clear sky changes as the viewer moves along the waterfront. This varied character is defined and acknowledged within the SPD, noting a distinction between the areas where tall buildings are seen in juxtaposition with the Cathedral, backdropping the Dome, Western Towers or Cathedral roof, and areas where St Paul's is appreciated against clear sky, with no tall buildings in the backdrop (paragraphs 2.18 and 2.19). The SPD specifically defines the 1km stretch of the Southbank between New Globe Walk and Gabriel's Wharf as 'compromised', noting that in these locations "...tall buildings can be seen behind the dome or western towers so that their outlines are impaired. From other viewpoints tall buildings appear above the roof of the Cathedral or crowd close to the Cathedral on the skyline.' The SPD specifies that within this stretch of the South Bank new development should 'aim not to worsen and, where possible, to improve' the backdrop of these views.
249. The HTVIA has identified potential visibility of the proposals from a stretch of riverbank immediately south-east of the LVMF 16B.2 Assessment Point. Seen from here, the uppermost storeys of the proposals would be fleetingly visible, seen briefly in a sequence where, alongside 5 Aldermanbury Square and 120 London Wall, development appears between the western pediment and western towers of the Cathedral. This includes a short stretch of approximately 19m of pavement from which the north-western tower, pediment and Cathedral roof are presently seen against clear sky. Views 2.1, 2.1T, 2.1N and 2.2, 2.2T and 2.2N show in this stretch the proposals would be visible, reducing the extent of the Cathedral's silhouette appearing against open sky, seen below the central Apostle sculpture at the top of the pediment, but leaving the apex of the pediment remaining appreciable against clear sky.
250. As originally submitted, the proposal had a more visible and harmful impact on this view, rising to the shoulder height of the Apostle and therefore dominating the Cathedral to an unacceptable degree. Amendments have subsequently been made to address this impact to lower the height of the scheme so that it sits below the apex of the pediment, therefore reading as clearly subservient to the Cathedral, and now occupying only a sliver of sky space behind it.

251. The impact would be further mitigated by the addition of greening to the southern façade, creating a visual softness and contrast which would allow the Cathedral fabric and architectural composition to remain entirely legible and distinct. When viewed with a standard lens, the discernible visual impact of the proposals is also reduced and equally in the night time scenario this impact is reduced still further.
252. While an appreciation of the western front's composition and overall legibility on the skyline is therefore considered to remain intact, officers consider the loss of a sliver of open sky in the backdrop to the west front of the Cathedral to create a slight erosion of its skyline setting. Within the framework of the policy, the scale of this erosion should be considered in context, noting that this kinetic experience as existing is already defined as 'compromised' in the language of the SPD, with 120 London Wall and 5 Aldermanbury also appearing behind the pediment and roof of the Cathedral along this stretch of riverfront. Equally, given this baseline character, the extent to which the visual impact of the proposals equates to a 'worsening' of the backdrop condition is limited to approximately 19 metres of a much larger 1.92km riverside experience.
253. For completeness, viewpoints to the west of the LVMF 16B.2 Assessment Point has been considered. View A16 also shows the proposals partially visible along the waterfront, seen in the adjacent to the northern cathedral tower terminating below the top of the clockface. In this location, however, the Cathedral's silhouette is substantively backdropped by the Barbican towers and 120 London Wall. Therefore, while the proposals are visible, they have a far lesser impact compared with the other impact described in the preceding paragraphs, and are found to comply with paragraph 2.19 of the SPD, maintaining the existing skyline character to the Cathedral in this view which is backdropped by tall buildings in the baseline condition.
254. In summary and notwithstanding the mitigation noted above, Officers find that in view of the loss of a sliver of open sky backdropping the Cathedral assessed in paragraphs 262-269, the proposals incur a conflict with the language of the Protected Views SPD and therefore with policy CS13(2) of the Local Plan and Draft City Plan Policy S11.2 , S12.8(a).

Monument Views

255. As contemplated by Local Plan policy CS13, the Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City. The proposals fall outside of these viewpoints and approaches, and would not impact Monument Views as identified by the policy.

City Landmarks and Skyline Features

256. Core Strategy Policy CS13 (2) seeks to 'protect and enhances' views of historic City landmarks and skyline features. At maximum of +95.25m AOD and given the height of surrounding developments and its contemporary architectural context, the proposals have only a very limited visibility along the skyline. View A15 shows a barely imperceptible portion of the proposals will be visible from the southern end of Millenium Bridge, appearing east of City Point in the backdrop of St James Garlickhythe. However, in this view the proposals fall well below the prevailing horizon line, with no loss of clear sky silhouette to the church tower, retaining its distinct form on the skyline. Equally, while the closest City Landmarks and skyline features to the proposals are St Giles Cripplegate and the Barbican Towers, due to the location of the proposals to the east, intervening and neighbouring development and the overall conformity to the prevailing heights in the immediate locality, the scheme is found to protect the existing views of these skyline features (Views 3, 4 and 14).
257. The impact on St Paul's Cathedral as a 'City Church with a Skyline Presence' would be as set out above in the section on the St Paul's Heights views at paragraphs 247 – 254 resulting in a slight minor adverse impact to its skyline presence in conflict with Policy CS13(2).

City of London Strategic Views Conclusion

258. Officers have identified a loss of a sliver of open sky in the backdrop of St Paul's as seen from the Southbank. While the extent and impact of this loss is considered to be small, when assessed against the language of the Protected Views SPD, a minor degree of conflict arises with policy CS13 (2) of the Local Plan and Draft City Plan Policies S11.2 and S12 (8:a). This conflict is considered as part of the planning balance exercise at paragraphs 667 onwards.

Designated Heritage Assets

259. Objections have been received from Surveyor to the Fabric of St Paul's Cathedral and Barbican amenity groups and as part of individual residents' objections, concerns have been raised in respect of the impact that the scheme would have on the setting of St Paul's, the Barbican Estate (Grade II), Lutyens House (Grade II*) and surrounding conservation areas. These objections relate to the consolidation of taller development along Moorfields, and the location of the upper part of the proposals within the western portion of the site, which residents felt diminished the contribution that setting made to an appreciation of each asset's significance by intruding on views from the Estate interior, including Gilbert Bridge, Willoughby House and from Finsbury Circus, and lessening the extent to

which the composition of the Barbican Estate buildings are presently experienced as a whole.

260. Officers have considered representations carefully. There is some consensus, but clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.
261. Where the impact of the proposals on the significance of heritage assets is considered the same due to the proximity of an asset to another and inter-related significances, these are grouped below as appropriate and proportionate to the level of impact and sensitivity of the asset, in accordance with paragraph 200 of the NPPF.

Indirect Impacts (Designated Heritage Assets)

St Paul's Cathedral

Significance:

262. London's and one of the nation's most famous landmarks, it was London's first cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother cathedral of national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and crafts people overtime) and of the distinct English baroque style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.

Setting:

263. In terms of setting, for hundreds of years it was the tallest building in London. It was strategically sited atop Ludgate Hill, a rare topographical moment in City of London and one of its highest points, with a commanding position overlooking the River Thames. Following the great rebuilding act (1667), Wren had little influence over the even immediate, never mind wider, setting. The setting has been substantially altered over time often with the setting of the Cathedral at its heart, and to various degrees those elements together make a substantial contribution

to significance and an appreciation of it, in particular the architectural, artistic, historic and communal significance. Those contributing elements are deemed in descending order of importance

- a) those wider strategic plan-London riparian views from the Thames, its embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.
- b) The ancient processional route of royal and state national significance along The Strand/ Fleet St, a 'national spine' of celebration and 151 contemplation, along a route between the heart of government in Westminster and commerce in the city, where St. Paul's is the preeminent culmination and destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.
- c) Those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. These make a substantial contribution to significance and an appreciation of it.
- d) Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted in ad hoc and some active townscape curation over the generations, in particular from St Peter's walk (South transept axis), Cannon Street, the Paternoster Square development, amongst others, where the cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This makes a moderate/significant contribution to significance and an appreciation of it.

Impact

262. The proposal would preserve those aspects of setting which contribute to an appreciation of the Cathedral's significance, comprising elements (ii), (iii) and (iv) identified above.
263. In terms of those strategic City-wide riparian views from the banks of the Thames and its bridges, largely these are also preserved with the Cathedral remaining as the pre-eminent landmark in these views, overwhelmingly retaining this important element of significance both as a symbol of the Diocese of London and as an internationally famous symbol of London itself. Wren's great classical dome still dominates the townscape around and has been an enduring part of the London's character for centuries.

264. The Surveyor to St Pauls Cathedral and residents object to the impact on setting and significance from glimpsed partial views of the proposals seen from the Southbank in the approaches to Gabriel's Wharf, illustrated in views 2.1, 2.2 and A16, described in detail above.
265. These impacts chiefly arise from the visibility of the uppermost storeys of the proposals which would be fleetingly visible from the Southbank, seen briefly alongside 5 Aldermanbury Square and 120 London Wall, appearing between the pediment and towers of the western front. The existing condition of this kinetic experience therefore includes tall buildings seen in the backdrop of the Cathedral, varying in the degree of interaction with the Cathedral's silhouette, but specifically in the case of 5 Aldermanbury and 120 London Wall, seen sequentially above the pediment and Cathedral roof. These developments individually appear and disappear in views between the Cathedral's two towers, with the extent of open sky in the backdrop of the cathedral evolving as the viewer moves along the South Bank.
266. Notwithstanding this visibility of the proposals includes a short stretch of approximately 19m where the northern tower, pediment and Cathedral roof are presently seen against clear sky. While the amendments to the scheme have reduced the extent of this adverse impact, reducing the height so that the apex of the pediment remains seen against sky, there would still be a very slight erosion of the sky setting of the Cathedral in this view. Further mitigation is incorporated by the proposed greening to the southern façade, softening the built form of the proposals, enhancing the legibility of the pediment through contrast of materials, colour and solidity and ensuring it remains appreciated as a part of the western front composition. Further testing using night views show this mitigation to reduce the visible impact in these views to almost imperceptible.
267. Further to the west, the proposals are briefly glimpsed adjacent to the Northern tower (View A16). Here the setting of the Cathedral is less pristine, with tall buildings rising centrally and prominently in the backdrop. This creates a less balanced composition, reducing this specific contribution of setting within this view. In this case while the proposals are visible in this glimpsed viewpoint, joining with the silhouette of the north tower, the impact upon significance is reduced is commensurate to the more limited contribution of this viewpoint to the Cathedral's setting.
268. St Pauls Cathedral is an iconic Grade I listed building of international importance and its historic, architectural and evidential values are of the uppermost significance and therefore great weight must be attached to any harm to the significance in evaluating any impacts. Notwithstanding the limited nature of these visual impacts, and although only a tiny proportion of clear sky would be lost in the context of the kinetic riverside views when taken as a whole, Officers consider the proposals to result in a very slight erosion to the current established setting of this Grade I listed building.

269. Given the very high sensitivity of the Cathedral, officers therefore concur with Historic England and the Cathedral [and other objectors] acknowledging that this results in a level of less than substantial harm to the significance of the listed building; but officers consider the level of this harm to be slight, at the lowest end of the scale, as a result of the very fleeting and elusive quality of this impact. Officers further note that this has not resulted in an in-principle objection from Historic England, reflecting the fleeting nature of this adverse indirect impact. Great weight is attached to this harm when considered under the planning balance at paragraph 667 onwards.

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

Significance:

- A pioneering post war landscape designed by Chamberlain Powell and Bon with later alterations by Janet Jack of BDP and now the largest public space in the City;
- The soft landscaping and the value of experiencing the architecture of the Barbican in the context of trees, foliage, and greenery;
- The planned and connected immersive as well as visual experiences of the public, communal, and domestic gardens combined with private cascading balconies, ponds, fountains, sculptures and flower beds are seamlessly integral to the architecture of the Barbican. The centrepiece is the Lakeside in front of the Arts Centre. Collectively the richness and variety of these spatial reservoirs are recognised to be as significant as the buildings themselves.
- The pioneering masterplan of a raised vehicle free podium of varied public spaces and the highwalks;
- The limited entrances reinforce the conception of the landscape as a fortified series of spaces from the surrounding streets.
- The consistent use of a small number of materials, and detailing across the Estate, delivering a powerful sense of visual continuity, unity and singularity.
- The successful designed relationships with 'found' historic elements including the Roman and Medieval wall, and the Church of St Giles Cripplegate and associated gravestones.
- The southern boundary lower-ground level carpark, interface with the school playing fields and truncated severing of Mountjoy Highwalk, are elements which appear unfinished, inconsistent and detract from the special interest of the garden.

Setting:

264. Due to the contained and raised conception of the RPG, the primary setting of the landscaped gardens are the Estate buildings and historic elements within it. The enclosed nature and raised level also segregate the wider townscape adjacent to

the Barbican, aside from glimpse views between buildings and from surrounding streets. Beyond the eastern boundary, large modern commercial buildings to Moorfields form a well-established and neutral part of the Barbican's setting, visible from both the west and east of the RPG including the Gilbert Bridge and Willoughby House. As existing, site is not visible from the majority of the RPG interior, with the exception of Willoughby House, and is, alongside all of the structures outside the estate, demonstrably apart from the considered composition of the RPG as a whole. The site therefore presently makes a neutral contribution to its setting and an appreciation of significance.

Impact

265. The upper levels of the proposals would be visible from the RPG interior (Views 3, 4, 4N and 5). These views show the site would be visible in some instances infilling the existing extent of clear sky which backdrops the Barbican Arts Centre in views from Beech Street (View 3), and Willoughby House in views from Gilbert Bridge (views 4 and 4N) as well as visible to the east from Willoughby House, represented in views from Moor Lane (View 5). In all of these, the proposals are seen alongside the taller City Point building as well as the 21 Moorfields, both of which are located closer to the Barbican Estate buildings. These tall buildings presently backdrop those built features which frame the RPG in views east noted above. Therefore, while the proposals are considered to create a visible change in the surroundings this is not considered to adversely impact the present contribution that setting makes to an appreciation of the RPG's significance. The RPG would continue to be appreciated as a fortified and sheltered civic space, located in the heart of the contemporary city centre.

Barbican Estate (Grade II)

Significance

266. The Barbican Estate, designed by Chamberlain, Powell and Bon, is a leading example of a modernist project in the high Brutalist style, and is perhaps the seminal example nationally of a comprehensively planned, post-war, mixed-use scheme. The Estate is a composition of towers and long slab blocks at raised podium level, separating pedestrians from vehicular traffic, which enclose private and public landscaped open spaces centred on a canal in a Corbusian manner.
267. It is of architectural interest for its compelling architectural narrative, which encapsulates the macro and micro design intent of the architects in a dramatic arrangement of buildings and spaces which are tied together by a consistent and well-detailed bush and pick-hammered finish. It is of historic interest as a modern exemplar of comprehensively planned high-density urban living during the postwar recovery period delivering essential housing for the City of London, and for the associations with the architects.

Setting

268. The Estate's setting varies greatly around its perimeter, where a varying range of largely modern buildings, make a neutral contribution to its significance. There are a number of tall buildings in the vicinity of the Estate which result in a highly urban skyline, however none of these hold a particular architectural or historic relationship with the Estate. As such, tall and large modern commercial buildings of differing materiality and compositions form a well-established neutral part of the Barbican Estate's setting to its eastern boundary. Their scale and proximity reinforce the enclosure and segregation characteristic of the Barbican Estate, albeit in a neutral way unrelated to heritage significance. This includes existing contemporary development around City Point Plaza, such as City Point and 21 Moorfields, which are visible from the estate interior, seen rising above the Barbican Arts Centre, Willoughby House and the Gilbert Bridge accordingly. The site in its cleared condition is not visible and makes a neutral contribution to the setting and an appreciation of significance.

Impact

269. The proposed development would have intervisibility with the Barbican Estate both from within its setting and from views within the Estate. As assessed in the preceding sections on strategic views, the Barbican's architectural significance in skyline views would be preserved.

270. In more local views from within the estate including from Beech Street (View 3) and the Gilbert Bridge (view 4 and 4N), the key buildings of the Barbican Estate including the unique Highwalks would remain dominant and legible in the foreground, retaining their compositional value. Due to the scale of buildings within the Estate itself, only the upper floors of the tallest parts of the proposed development would be visible from limited parts of the Estate, consistent with the consented scheme. The proposed building would be a distinct element in its eastern setting, seen together with and beyond 21 Moorfields and City Point. The lighter materials of the proposal would clearly differentiate the development from the Barbican as a complex, so that the Barbican buildings remain easily legible, with no diminishment of their group value or compositional clarity.

271. In views of the Barbican Estate to the east of the site (View 14), the upper most floors of Shakespear Tower are glimpsed. While the proposals would slightly reduce the visible extent of the tower, the partial and fleeting nature of this glimpsed view reduces its overall townscape quality, contributing little to an appreciation of the Barbican's wider architectural character. The proposals are therefore considered to preserve the overall architectural quality of this view.

272. As such while the development would change the setting to the east, this is not considered to challenge the pioneering mid-20th century masterplan, architectural language or qualities which underpin the significance of the Barbican

Estate and its existence as a unified entity would remain fully appreciable. Taking the listed building as a whole it is considered that the proposal would preserve the setting and significance, both directly and indirectly, of the listed building.

Barbican and Golden Lane Estates Conservation Area

Significance and contribution of setting

273. The conservation area boundary is tightly drawn around that of the two Estates and the grassy spur of land to the south containing the ruins of the Roman and medieval City wall.
274. Overarchingly, the significance of the conservation area can be summarised as the striking juxtaposition between two seminal post-war housing Estates which illustrate evolving trends in architecture, spatial and urban planning, and Modernism in general. The conservation area is defined by its pervasive modernity, by the consistency of modern forms, spaces and finishes throughout, all executed to a very high standard of quality and representing an immersive experience strikingly at odds with the more traditional townscapes and buildings outside the boundary; also for the integration of the ancient remains of the Roman and Medieval City wall, including Bastions 12, 13 and 14 and the medieval church of St Giles Cripplegate in a strikingly modern context.
275. The wider setting of this large Conservation Area is informed by dense urban development, of a largely post-war, post-modernist and modern architectural character. To the east, there is a mixed townscape around Moorgate, largely comprised of large scale modern commercial buildings in the immediate vicinity of the Conservation Area – namely the redeveloped series of office blocks that were built along the road London Wall in the 1970s. As outlined above in relation to the listed building, the Barbican and Golden Lane Estate Conservation Area is appreciated as standalone neighbouring architectural masterplans. There is little reliance on the wider surroundings to aid appreciation or an understanding of their overall historic, architectural and artistic values. The site is location outside of the conservation area boundary.

Impact

276. The impact to the conservation area is considered consistent with that to the listed Barbican Estate buildings, namely while the development would change the setting to the east, this is not considered to challenge the existing character of the conservation area which is presently experienced alongside tall contemporary development to the east on Moorfields. The pioneering mid-20th century masterplan, architectural language or qualities which underpin the significance of the Barbican Estate and its existence as a unified entity would remain fully appreciable. It is therefore considered that the proposal would preserve the character and appearance of the conservation area, as well as the contribution of setting to an appreciation of its significance.

Lutyens House (Grade II*), Salisbury House (Grade II) and Electra House (Grade II)

277. The Barbican and Golden Lane Residents Association raised concerns regarding the impact to the setting of Lutyens House. This is addressed in the assessment below.
278. These buildings form part of grand architectural composition completing the western side of Finsbury Circus. The assessment of the impact to these buildings has been grouped due to their proximity and interrelated group value. All are built using classical architectural motifs, creating an elaborate frontage to both the park to the east as well as along Moorgate, London Wall, and Eldon Street.

Significance

279. Lutyens House, also known as Britannic House, was designed by Edwin Lutyens in 1924-27, generate high associative interest through its connection with Lutyens, one of the most influential architects of the period. It has distinct historic interest as an early 20th century office, illustrating evolving approaches to office architecture during this period. As Lutyens's first large and elaborate corporate project, this adds to its historic interest. Architectural interest derives its restrained classical detailing, creating a severe sculptural quality to the structure as a whole typical of Lutyens. It has group value with the other buildings at Finsbury Circus.
280. Electra House was designed in 1900-3 in the Classical style by Belcher de Joass and is now occupied by the London Metropolitan University. The building has architectural and historic interest as an imposing commercial building from the early 20th century. Artistic and architectural interest derives from decorative elements including sculptures by George Frampton, and landmark quality to its roof form with large concave colonnade and dome to roof. It forms a cohesive ensemble and has group value with the other buildings at Finsbury Circus, with a strong presence at the junction of Moorgate and London Wall.
281. Salisbury House occupies the whole south-west quadrant and was built between 1899 and 1901, to the designs of Davis and Emmanuel. The building draws upon a more elaborate French decorative style, further differentiated by the use of Bath stone, with extensive embellishment. It has historic and architectural interest as an imposing commercial building in the French style, constructed at the turn of the 19th to the 20th century, featuring intricate decorative elements. Although a later addition, Salisbury House reflects the grand architecture and formal arrangement of Finsbury Circus and has group value with the buildings surrounding Finsbury Circus.

Setting

282. All buildings, structures and landscaping associated with the planned arrangement of Finsbury Circus make a positive contribution to the setting of

these assets. The verdant quality of the park contributes to a sense of exclusivity and respite despite the busy City centre location. Further the buildings which compete the curve of the circus, make a high positive contribution through the completion of the circuses' characteristic curved geometries.

283. Beyond the ellipse of the park, and circus itself, there is a mix of historic and modern development in the vicinity of these assets. The immediate local setting of all of the buildings, includes modern tall commercial development including Moor House, 21 Moorfields and City Point, as indicated in Views 7 from Moorgate and View 8 at the entry of Finsbury Circus from Circus Place. In these views contemporary development along Moorfields readily appreciable, in view 7 the upper stories of contemporary development appearing above the roofline of the circus interior. The site presently forms part of this modern development to the west, making a neutral contribution to this listed groups setting, and appreciation of their significance.

Impact

284. In views 7 and 8 the upper storeys of the proposals are perceptible, seen amongst the taller structures of City Point and 21 Moorfields. The upper parts of the proposed development would be seen above the roofscape of these buildings in various westward views from around the Circus, although in most views this would be mitigated by significant levels of tree cover (even when not in leaf). While the proposals would add to the visible extent of modern development perceptible to the west of the Circus, this addition is considered to be in keeping with the existing character of Circus interior, as well as views north and south along Moorgate. The resulting impact upon the contribution of setting to an appreciation of each asset's significance is therefore considered to be neutral. The proposed development, in baseline and cumulative scenarios, would not affect the significance of this asset, or the ability to understand and appreciate it.

The Globe PH (Grade II), 87 Moorgate (Grade II), Former Fox's Umbrellas (Grade II), 2 Moorfields (Grade II), 4 Moorfields (Grade II), 8 Moorfields (Grade II), 87 Moorgate

Significance

285. This group of listed buildings forms a distinctive cluster at the junction of London Wall and Moorgate. Assessment of impact to these buildings has been grouped due to their proximity and interrelated group value. All of the buildings are characteristic of mixed commercial and residential nineteenth century development within the capital. Ground floor commercial activities create richly decorative shopfronts at ground floor, establishing a vibrant cosmopolitan character. The buildings are all of a similar height, creating an intact quality to the group, which all use a regular rhythm to the fenestration and classical detailing. Some later alterations to the ground floor shopfronts have generally preserved

the nineteenth century character of each building on the whole. As such each building possesses high architectural and historic interest.

Setting

286. Setting makes a high positive contribution to the listed group, with the highly visible junction location underscoring the commercial uses at ground floor, as shown in View 7. Electra House is seen to the east, and similarly adds to the sense of an appreciable complimentary nineteenth century townscape in the wider surroundings. The small park directly to the south of the listed group also adds to the civic character, making a positive contribution. The site is located to the northwest of this group surrounded by taller contemporary development to the western side of Moorfields. This includes the recently opening of the Elizabeth line entrance into Moorgate Station, which draws the eye as a new important transport hub. The character of the buildings to the west of Moorfields is clearly distinct from that of the listed group, of a notably different scale, material character and overall architectural identity. These buildings, including that of the site, are considered to make a neutral contribution to the setting of the listed group. It is noted that the buildings to the west of Moorgate, establish a backdrop in views to the group from across the junction, so that this change in scale and character is readily apparent.

Impact

287. The proposals are seen in views 6 and 7, partially visible in views northwest from the listed group and also from the junction with London Wall. In these oblique and partial views, the proposals would be glimpsed, and screened from development at 21 Moorfields and existing structures to the west. In this context therefore the proposals are seen as an appropriate addition, with no harmful impact to those aspects of setting which enhance and appreciation of the listed group's significance. The resulting impact upon the contribution of setting to an appreciation of each asset's significance is therefore considered to be neutral. The proposed development, in baseline and cumulative scenarios, would not affect the significance of this asset, or the ability to understand and appreciate it.

Moorgate Underground Station (Grade II)

Significance

288. Designed by T Phillips Figgis in 1900, the building has a striking appearance through its use of red brick with Portland Stone dressings, contrasting with the prevailing use of stone in the area. However, the building is typical of turn of the century style, incorporating an expressive roofscape finished in slate as well as decorations such as tall oriel windows and dome. There is a clear hierarchy to the facades, with the elevation to Moorgate easily appreciable as the principal façade through its more elaborate decorative treatment. The building's

significance stems from its historic interest as an example of early twentieth century station architecture, to a lesser degree its architectural value is also high, with its decorative facades reflecting the civic use of the building.

Setting

289. Located directly west of Lutyens House, the buildings surrounding Finsbury Circus which complete the eastern side of Moorgate make a positive contribution to the setting of the station building, creating a consistent nineteenth and early twentieth century townscape in views north along Moorgate. The wider surroundings of the station are generally mixed and includes later buildings, of plainer appearance with less architectural refinement. This includes the building immediately to the south at 137- 141 Moorgate, as well as the contemporary and late twentieth century buildings to the west of Moorfields. This includes the recently completed Elizabeth Line extension at 21 Moorfields as well as 44 Moorfields and the site. While in close proximity, these buildings and the site are unrelated in terms of architectural character, scale or decorative detail. They make a neutral contribution to the setting of the listed building, notwithstanding the ground floor use of 21 Moorfields as an entrance to the underground creates a shared function. Due to the axial character of Moorgate and the width of the road, despite taller contemporary buildings in the immediate vicinity, the listed building has retained its landmark character, within its important civic function remaining readily appreciable.

Impact

290. Views 13, 15 and 16 illustrate the visibility of the site in views west from Moorfields, where the site is prominently seen forming a group with the existing contemporary buildings to the western side of the street. The proposals are shown to create a change in the setting of this listed building, through the addition of another building of considerable height and mass to the background of views looking west. However, the proposals would be seen in context, forming part of an established group of taller contemporary development to the west. Consequently, an appreciation of its robust turn of the century design is considered to be preserved. Equally, the tight urban location limiting views where the proposals will be seen together with the station into oblique glimpses. Officers therefore find the proposals would not adversely impact the contribution setting makes to an appreciation of the building's significance. The proposed development, in baseline and cumulative scenarios, would therefore not affect the significance of this asset, or the ability to understand and appreciate it.

Finsbury Circus Conservation Area and Registered Park and Garden (Grade II)

291. Finsbury Circus is a relatively small area comprising the registered park and garden of Finsbury Circus and its surrounding development. The laying out of Finsbury Circus was implemented in 1815-17 by George Dance's successor as

City Surveyor, William Montague, although its design dated from 1775-1800. The significance of the Conservation Area is derived from its inclusion of buildings of a high architectural quality and composition, strategically situated around the formal planned development of Finsbury Circus, which is considered to be an unusual feature within the City of London.

292. The oval shape of the gardens, built in conjunction with the original layout of the square, provides a characterful perimeter to the green open space. The mature trees and garden layout contributes to the leafy character central for the Circus. It features large 19th and 20th century commercial buildings with extensive ornamental detail and a generally uniform roofline. Buildings are of particular historic and architectural interest as impressive 19th and 20th century commercial buildings with extensive detailing, modelling, uniform height and varied rooflines.
293. There are a number of listed buildings in the Area: London Wall (Scheduled Ancient Monument), Lutyens House (GII*), Park House and Gardens (GII), Finsbury House (GII), London Wall Buildings (GII), Salisbury House (GII), Business School, London Metropolitan University (GII), Drinking fountain and shelter, north side of gardens (GII).

Setting

294. The conservation area and the RPG is bound by London Wall to the south, Moorgate to the west, Blomfield Street to the east and South Place and Eldon Street to the north. To the south the Conservation Area shares a boundary with the Bank Conservation Area, and New Broad Street Conservation Area to the east. The residential towers of the Barbican are visible to the west of the Conservation Area, with other, contemporary, taller buildings visible within its immediate setting. Owing to the imposing buildings contained within such a tightly planned space, the sense of enclosure is extensive, meaning that long vistas outwards are limited.

Impact

295. The proposed development would be visible from the southern and eastern parts of Finsbury Circus, and from the surrounding streets and pavements, as illustrated in views 7 and 8 and the ZTV of the TBHVIA. This shows that the proposed development would be partly seen, and partially screened by trees cover in both the winter and summer scenarios. When visible, the proposed development would be seen in the context of several existing tall buildings, including 21 Moorfields and City Point. The proposed development would therefore appear in keeping with the appreciable broader context of Finsbury Circus. As such, the proposed development, in baseline and cumulative scenarios, would not affect the contribution of setting to the significance of the Registered Park and Garden, or the setting, character, appearance and significance of the conservation area.

Bunhill Fields/Finsbury Square Conservation Area and Bunhill Fields Registered Park and Garden (Grade I)

296. Bunhill Fields/Finsbury Square Conservation Area is located in the London Borough of Islington (LB Islington) and was designated in April 1987. It is located to the north of the Site. The character of the conservation area stems from its historic use as an artillery ground, now the grounds of the Honourable Artillery Company. Bunhill Fields to the north was later enclosed in 1665, and used as a burial ground and in time a nonconformist cemetery. Finsbury Square itself was laid out by George Dance the Younger in 1777. The Conservation Area character and appearance chiefly reflects the open green spaces of each. Considerable historic interest and commemorative value is generated through the inclusion of Bunhill Fields, with a large number of listed structures to its interior, including the Grade I Wesley Chapel. The built character is generally of high quality late Victorian and Edwardian with some more modern buildings, on the whole establishing a cohesive, grand and commercial character to the streets surrounding the burial grounds and Finsbury Square. Bunhill Fields is enclosed by mature trees, which due to the dense verdant character means that in the summer months there is little visibility out of the area, with event winter view heavily filtered by tree branches. The Architectural and Historic Interest of both the conservation area and RPG is therefore high.

Setting

297. Views of the City and its clusters of tall buildings are prominent throughout the conservation area, including views of Broadgate Tower, Principal Place, the Barbican Towers and 25 Ropemaker Street. These tall buildings are seen from the open spaces but also in incidental views from the surrounding streets. Tall buildings therefore form an established part of the setting of the Conservation Area, and registered park and garden particularly in views south.

Impact

298. The ZVI shows the proposals would be visible to the northeast corner of Finsbury Square, within the centre and north of the Artillery Ground and a small area to the northeast corner of Bunhill Fields. In all of these locations, all to the north of the Site, the Proposed Development would be seen amongst large scale commercial schemes at 20, 33 and 25 Ropemaker Street as well as City Point and 21 Moorfields. While there would be limited partial glimpses of the top of the Proposed Development in small parts of the Conservation Area and RPG, this is considered to be consistent with the existing character of their settings, in which distant tall buildings are glimpsed from afar. The contribution of setting to an appreciation of significance for both assets would therefore be unchanged. There would be no effect on the heritage significance of the Conservation Area.

Other Heritage Assets

299. The setting of a heritage asset is defined in the NPPF as “The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.” Given the dense central London location, the site is within the setting of a large number of heritage assets. As part of the application process a scoping exercise was conducted so as to identify heritage assets the setting of which may be affected. The designated heritage assets considered included:

- Armourers' and Braziers' Hall, Grade II*
- Salters' Hall, Grade II
- 80 Coleman Street, Grade II
- 16 Whitbread's Brewery Buildings, Grade II
- Sugar Room, Whitbread's Brewery Buildings, Grade II
- Former Porter Tun Room, Whitbread's Brewery Buildings, Grade II
- 63-73 Moorgate, Grade II
- Bank Conservation Area
- New Broad Street Conservation Area
- Bishopsgate Conservation Area
- London Wall remains [1018885], Scheduled Monument
- London Wall remains [1002051], Scheduled Monument
- London Wall remains [1018886], Scheduled Monument

300. It is the view of Officers that the proposed development would not harm the setting or the contribution that the setting makes to the significance of these heritage assets, due to the relative distance of the proposals or limited visibility in views which contribute to an appreciation of each asset's significance. The assets assessed in detail in this report are those where their significance has the potential to be affected by the proposed development.

301. Other assets have been scoped out of consideration for the reasons given in the HBT VIA, and Officers agree with that scoping exercise. Officers consider that the identification of heritage assets which may be affected, and the assessment of impact on significance as set out in the HBT VIA and in this report, are proportionate to the significance of the assets and to the nature and extent of the proposed development. Officers are confident that the analysis that has been undertaken is sufficient to identify the heritage assets which may be affected, to understand their significance, and to assess impact on that significance.

Heritage Assets Conclusion

302. The proposals would preserve the significance and contribution of setting of all the aforementioned heritage assets except that of St Pauls Cathedral (grade I), which would experience, via setting impacts, a slight, very minor level of less than substantial harm. As such, the proposal would result in some conflict with Local Plan Policies CS12 (1), DM12.1 (1), CS13(2) and draft City Plan 2040 policies

S11 (2), HE1 (1), S13(2) and London Plan Policy HC1 (C), and with the objective set out in Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.

303. The public benefits and harm to the setting of St Paul's Cathedral are considered as part of the paragraph 208 NPPF balancing exercise, and in the final planning balance at the end of this report. Objections on heritage impacts have been received from St Paul's Cathedral and Barbican amenity and resident groups. Officers have considered these representations carefully. There is some consensus, but some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

Archaeology

304. Policy DM12.4 of the Local Plan 2015 and policy HE2 of the draft City Plan 2036 outline the requirements with regards archaeology, outlining that the City will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking inclusive access to, public display and interpretation where appropriate.
305. 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. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.
306. The proposed development is in an area of archaeological interest. The Local Plan 2015, states 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.
307. The proposed development comprises works related to an additional 0.6m of excavation beyond the existing basement. This basement design would extend southwards beneath New Union Street, beyond the basement and building's existing footprint. This excavation would be limited to the south to avoid undermining the existing TFL retaining wall of Moorgate Station. The ramp to the car park, to the North-East of the site would be demolished and filled in, for the construction of ancillary office accommodation including end of trip facilities in its place at basement level. This groundwork would include the placement of ground beams and reinforced piling into as yet untruncated Taplow Gravel and London Clay.
308. There are no non-designated archaeological assets within the Site boundaries. The St Giles Cripplegate workhouse was set up on 1726 on Moor Lane, c.130m

to the north-west of the Site. The remains of further (as yet unidentified) Post-Medieval buildings have also been recorded c.100m to the south-east of the Site. The development of a more complex drainage and underground sewer system is seemingly demonstrated by the discovery of brick arched vaults dating to the earlier C19th running beneath Fore Street, c.130m south-west of the Site. Within the wider 150m Study Area, there are 67 non-designated assets, largely comprising Romano-British and Medieval features and structures. As a whole, the City of London is considered an Archaeological Priority Area (APA), and is afforded high archaeological sensitivity.

309. However, the Proposed Development has the potential to have a direct physical impact on any as yet unknown surviving archaeological assets, which would be permanent in nature. Physical impacts during works related to construction such as piling, excavation of foundations, basements, and service trenching could partially or wholly remove known or as yet unknown buried archaeological remains.
310. The Archaeological Desk Based Assessment (DBA) by Waterman concludes that there is a high potential for Post-Medieval remains of low heritage significance; a moderate potential for Romano-British remains of potentially high significance; a low to moderate potential for Medieval remains of low significance; and a low potential for Prehistoric remains of a moderate significance.
311. The DBA has been fully revised in line with the comments provided by GLAAS (Greater London Archaeological Advisory Services) (Historic England) and is now of an acceptable standard. The DBA has illustrated that some impact to archaeological remains would be caused by the redevelopment of the site and therefore archaeological mitigation work is recommended as condition attached to any grant of planning permission.
312. The NPPF envisages evaluation being undertaken prior to determination, in the consideration of the nature of the development, and as recommended by Historic England, the archaeological interest and/or practical constraints are such that a two-stage archaeological condition and a foundation design condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.
313. The proposals are, overall and subject to condition, in accordance with policy DM12.4 of the Local Plan.

Access and Inclusivity

314. 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 NPPF paras 96 and 135, policies CS10, DM10.1, DM10.5 and DM10.8 of the

Local Plan, policies S1, HL1, and S8 of the draft City Plan 2040 and policy D5 of the London Plan. These policies require the highest standards of accessible and inclusive design, securing development that is welcoming, safe and easy to use without disabling barriers, undue effort, separation, or special treatment.

315. 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.

The Site

316. The site is well-served by public transport, including London underground and national rail from Moorgate and buses from Moorgate and London Wall. The walking distances from key public transport nodes exceed the recommended 50m without a rest. It is therefore recommended that resting points with accessible seating are proposed wherever possible at maximum intervals of 50m along the approaches to the building from key points of arrivals; the proposed seating would be provided on private land and delivered as part of the works to the Plaza, with details to be secured by condition. A travel plan would be secured via the Section 106 agreement to detail how disabled visitors could request support to get to/from this site if required. Further details of the travel plan are set in the Transport and Highways section of this report.
317. The development site has a Public Transport Level (PTAL) of 6b which is defined as having excellent access to public transport. City Point Plaza is currently stepped at various levels when accessing from Moor Lane and Moorfields. The proposed works to the public realm seek to create level access across the site, with stepped access only through the centre of the proposed planters where steps are unavoidable to navigate inherent level changes within the Plaza. The level access route across and around the Plaza would be clear to users. Further information including gradients is secured by condition and through the S278 to ensure that gentle slopes or shallow ramps can be secured. Details of all surfaces including contrast and tactile paving would form part of the conditions. Subject to these conditions, the provision of level access across the plaza is considered a substantial benefit to the scheme as discussed in the Para 208 balancing exercise.
318. The public realm seating would offer a range of seating options at different heights, with back and arm support, and the option for facing and single seating, making it inclusive to a range of people and flexible activity. All surface treatments in the public realm would be sufficiently detailed to provide high contrast and non-slip materials. These details are secured by condition.
319. Signage and wayfinding is 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 are secured by condition.

Office Lobby

320. London Plan D5 requires entrances to be easily identifiable and to allow independent use without separation. All entrances to the development would be step free, automated and with a minimum clear opening width of at least 1000mm. Further details are secured via condition to ensure the design of the manifestation, thresholds, mat wells and floor finishes, and door furniture are designed in line with inclusive-design best practice guidance.
321. The main entrance proposed to Tenter House is from City Point Plaza. Provision would be made for an enclosed entrance lobby with inner and outer sets of automated, sliding double doors. Additional dedicated entrances would be provided to the proposed community unit (from City Point Plaza) and to the Restaurant (from Moorfields). All entrances are designed to meet the guidance of AD M(2): 3.6 and BS 8300 8.6.2.
322. The reception and lobby area for the proposed building has been designed around a large, open plan space with a circular reception desk at one end of the lobby that is clearly visible from the main entrance. Security barriers between the reception and main core would feature at least one barrier in each location with a minimum clear-opening width of 1000mm.
323. An Access Management Plan (AMP) for visitors and building users on points of arrival and entrances would be required and is secured by condition.

Cycle Parking and End of Trip Facilities

324. The entrance to the cycle parking areas and end of trip facilities is via New Union Street and is step-free. The approach is via a ramp, where the gradient would be 1 in 15 from New Union Street down to lower ground floor levels, and would involve passing through no more than two sets of wide automated doors. Controls should meet best practice guidance as set out in BS 8300 (2) 8.2.3 to be accessible to a range of users.
325. There would be a total of 23 long stay spaces provided for larger accessible cycles (adapted, tricycles and recumbent cycles etc.), which would meet the London Plan requirements of 5% of the total cycle parking provision for such cycles. These would be accessed by the dedicated cycle parking entrance on New Union Street.
326. The development does not include any car parking spaces. At least one disabled car parking space is planned to be included on the public highway on Moorfields as part of local highways improvements to be secured by S278 agreement. This

is in addition to making use of existing 2no. blue badge parking spaces located on the public highway.

327. All shower facilities would be wheelchair accessible; provision has been made for 1no. unisex wheelchair accessible WC and shower at lower-ground floor level. Access to the basements would be step free.

Offices and External Amenity Spaces

328. London Plan D5, (B)5 states *'in all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'*. 6.2.1 further states that there should be an evacuation lift in addition to fire-fighting lifts. All lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure.
329. Corridor widths and door openings are confirmed as consistent with AD M(2), including sufficient door widths and passing places for wheelchairs and is subject to detailed design development.
330. The proposal includes community space fronting City Point Plaza creating a direct visual link to the public realm. The internal arrangement of the community space is designed to meet the highest standards of access and inclusion, creating buildings which meet the needs of the existing and future population in line with London Plan D5 3.5.9.
331. The external amenity terraces proposed would be fully accessible for wheelchair users, with a firm and even surface within the landscaping/planting layout and wide circulation routes. The terraces are accessed via manual single leaf swing doors which should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Where a non-powered door is necessary the opening force should not be more than 30N from the closed position to 30 degree open and not more than 22.5N from 30-60 degrees of the opening cycle (AD M 2, 2.13). Further detail of terrace doors is secured via condition.
332. The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind, the detailed design of which is secured by condition.
333. Safe, efficient egress depends upon a combination of management procedures and building design. Fire exits are proposed at both City Point Plaza, to Moorfields and New Union Street that would have level thresholds with minimum 800mm clear opening.

Conclusion

334. The proposal has been designed to ensure that the site meets the highest standard of inclusive design. In order for the proposed office use to fulfil its goal of being an inclusive and welcoming place to work, high accessibility standards and inclusive environments and practices are essential. Great consideration has been given as to how to improve the landscaping and the arrival experience to the building in order to secure the optimal solution for the greatest range of building users. Subject to further design details and an Access Management Plan, it is considered that the proposal accords with the access related policies outlined above.
335. Overall, the proposal accords with the access policies outlined above, subject to the recommended conditions. The step-free access via Moorfields and Moor Lane to City Point Plaza is considered a significant benefit of the scheme, helping towards an inclusive City for all and is welcomed as part of the proposals.

Highways and Transportation

Public Transport

336. The Public Transport Accessibility Level (PTAL) rating for the Site is 6b, which is the highest possible score. The score was derived using TfL's WebCAT service.
337. Moorgate Underground station is the nearest station to the Site and is served by the Northern, Hammersmith & City, Metropolitan and Circle, and Elizabeth Lines, and National Rail services. The Elizabeth Line is step-free, there is step free access to the Northern Line but with a ramp, and there is step-free access to one direction of the Hammersmith & City, Metropolitan and Circle lines as part of the new Elizabeth Line OSD, but overall Moorgate Station is not fully step free to accommodate disabled users. Improvements to access for disabled people are planned or partially implemented at nearby Bank station. The Central Line lacks step free access at any station near the Site.

Car parking

338. The Site is within the Controlled Parking Zone (CPZ), restricting on-street parking Monday to Friday, 7am to 7pm and Saturday, 7am to 11am (except Christmas Day, Good Friday or a Bank Holiday).
339. The Site has 51 car parking spaces, all within the red line boundary of the current proposals, accessed via the ramp from Moorfields. All car parking spaces are proposed to be removed in line with policy T6 (Car Parking) T6.2 of the London Plan, where new office developments are proposed to be "car-free".

340. On the public highways around the site, within the vicinity of the development, there are a number of disabled parking spaces on Moorfields, Moor Lane, Fore Street, Silk Street and Milton Street. These spaces are available to Red and Blue Badge holders, with limits to a maximum stay of 4 hours on Mondays to Fridays inclusive.
341. Two existing disabled parking bays are located on Moorfields closest to the proposed Class E(a/b) unit (restaurant/café) and Office lobby.
342. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2040 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.
343. The levels of provisions are set out in Table 10.6 of the London Plan, to ensure that all non-residential parts of a development should provide access to at least one, on or off-street disabled persons parking bay. A car-free development has no general parking but still should provide disabled persons parking in line with policies above.
344. The proposed development would be car-free, including not providing a disabled parking bay within the site.
345. However, an additional disabled car parking space is to be included on the public highway on Moorfields as part of local highways improvements, and secured under the S278 agreement. It is considered that the three spaces on Moorfields would be sufficient for the proposed development to utilise; however, the applicant should monitor demand that is required on-street and encourage the use of public transport for its tenants through travel planning measures.
346. A Travel Plan (TP) is required to monitor the demand for the disabled car parking spaces and to encourage the use of public transport through travel planning measures:
- to include details on facilitating alternatives to car parking for disabled users (staff and visitors) for all land uses of this development.
 - to record and manage the demand for the disabled car parking spaces coming from this development.
347. The TP must also monitor the demand for on-street car parking spaces coming from this development. If records show that demand is higher than the available spaces nearby, the developer would be required to provide additional travel plan measures to support the needs of the disabled users of this development. Further details of the scope of works under the S278 agreement are outlined in the CIL and S106 Obligations section below.

Cycle parking

348. The London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements published in the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.
349. The proposed level of cycle parking required to be compliant with the London Plan is as follows:

| Use Class | Floorspace | Long stay | Short stay |
|---------------|----------------|-----------|------------|
| Class E(g)(i) | 33,758sq.m GIA | 469 | 17 |
| Class E(a/b) | 287sq.m GIA | 2 | 15 |
| Class F2(b) | 142sq.m GIA | 1 | 2 |

350. In total, 506 spaces are required by the London Plan standards, split as 472 long stay spaces and 34 short stay spaces.
351. The proposal includes a total of 511 spaces; 489 long stay spaces and 22 short stay spaces. As such there is an overprovision of long stay cycle spaces and the 12no. spaces in the short stay 'shortfall' are instead provided as long stay spaces. The proposed cycle parking provision is therefore considered suitable and is policy compliant. There is also a significant increase in cycle parking over the consented scheme.
352. A dedicated step-free access route to the cycle parking and end of trip facilities, is from New Union Street. This is acceptable.
353. 5% of the cycle parking spaces are accessible for adapted cycles and this arrangement would be secured via condition in line the London Plan Policy T5 (Cycling) with the London Cycling Design Standards 8.2.1, and the draft City Plan 2040 AT3.
354. The proposal includes suitable end of trip facilities to accompany the cycle store, including showers, lockers and changing facilities. As outlined in the submitted Transport Assessment, the lockers provision is a 2:3 ratio, and as such 345 lockers are to be provided. A total of 33 showers including 1 AWC is provided. This meets the London Plan standards.

Servicing and deliveries

355. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2040 Policy VT2 – 1 requires development proposals to provide adequate space off-street for

servicing and deliveries, with on-street loading bays only used where this is not possible.

356. The servicing and deliveries are proposed from New Union Street (which is a privately owned street) at lower ground floor of the building. The proposed service yard has two loading bays and could accommodate vehicles up to 10m rigid lorries with a gross weight of 7.5T. Swept path analysis has been included to show that lorries would be able to egress NUS.
357. The swept path analyses of manoeuvring within the servicing area have been included in the Transport Assessment addendum, (Appendix D), to show vehicle movements of different vehicle types and sizes. The swept paths for light van 4.6T; box van 7.5T (8m) and CoL refuse vehicles (7.75m) were included and considered acceptable. The rigid lorries with gross weight of 7.5T (10m, 4 axle) are not proposed to be used, therefore swept path analysis for this type of vehicle is not included.
358. With regards to trips generated and associated with servicing/deliveries activities, the consented scheme (2020) predicted 67 trips per day, 57 of which were based on the assumption of 0.22 deliveries per 100sqm of Class E office floorspace, and 10 trips for retail floorspace at a rate of 1.35 per 100sq.m.
359. If the same methodology is applied, the amended proposal with 35,533sqm (GEA) of office floorspace is estimated to generate 77 deliveries per day, whereas the retail servicing/deliveries demand is a maximum of 4 deliveries per day, with a nominal 1 daily delivery anticipated for the community use, resulting in a total of 82 trips per day.
360. When comparing the consented scheme with the current proposal, 15 additional trips are proposed to be generated to serve the activities associated with servicing and deliveries. As part of the pre-existing building, there were approximately 42 daily vehicle trips from servicing.
361. With the requirement for 50% consolidation, the total maximum trips per day is reduced to 41 trips. This is the same number of trips as secured through consolidation of the consented scheme as per the S106 agreement, and is one daily trip less than the pre-existing building. As such, the delivery and servicing trips are considered acceptable and in line with the pre-existing and consented schemes. Despite the increase in floorspace of the building now proposed, there would not be any adverse impact to the local highways network as a result of servicing trips over and above the existing building or consented scheme.
362. The majority of deliveries in the proposal would be carried out using small vehicles (less than 7.5T including transit vans, car, motorcycles and bicycles) and would be able to enter and exit the loading bay in forward gear. A small number of vehicle trips (approximately 5 per day (12.2% of all deliveries) would be required by

Heavy Goods Vehicles (HGVs) up to a maximum of 7.5T vehicles which would need to reverse into the loading bay to exit in forward gear. The remainder of 36 deliveries would be carried out by LGVs including motorcycles.

363. No 10m vehicles would be used in the servicing strategy that would need to service directly from New Union Street instead of from within the loading bay, which is positive. Whilst it would be desirable to prohibit the reversing of any vehicles into the loading bay, it is not considered that 5 vehicles per day reversing into the loading bay from a private street would unduly impact on highways safety or cause noise disturbance to a harmful level from the reverse beepers of the HGVs.
364. In order to mitigate any potential impacts on the nearby residential occupiers from the operation of the loading bay and the queueing of vehicles on Moor Lane, the following measures are proposed (which would be secured via condition and S106 obligations):
- A door to be fitted at the entrance of the loading bay and any loading, unloading and compacting activity would take place only when the loading bay doors are closed (a condition is recommended requiring further details of the noise attenuation properties and design details of the loading bay door).
 - Limiting the number of deliveries to a maximum of 41 per day.
 - All deliveries to the site would be pre-booked to ensure that all deliveries could be accommodated within the two loading bays within the servicing area, and to ensure coordination with waste and recycling collection.
 - A banksman would be positioned at the loading bay access during the hours of operation controlling access to and egress from the loading bay.
 - Hours of operation would be restricted in peak hours between 07:00 – 10:00am, 12:00-14:00pm, 16:00-19:00pm.
 - No vehicles servicing the site after 21:00pm to reverse in or out of the servicing bay.
365. The draft City Plan 2040 Policy VT2 requires major commercial development to provide for freight consolidation. London Plan Policy T1 (Strategic approach to transport) requires development 'to minimise freight trips on the road network including through consolidation'. Proposal 38 in the City of London Transport Strategy is to 'Reduce the number of freight vehicles in the Square Mile'. The City of London Transport Strategy defines freight consolidation as 'routing deliveries to a business, building or area via a warehouse where they are grouped together prior to final delivery.' The City of London Freight and Servicing SPD, point 63, requires suppliers to use consolidation centres in suitable locations within Greater London to minimise the number of trips required to service developments.
366. The applicant has agreed to implement freight consolidation measures aiming to reduce trips to a maximum of 41 total trips per day, to be secured through S106 obligation.

367. As outlined in the Consultation section of this report, numerous objections have been received from neighbouring residents regarding noise from servicing activity on the Site. The consolidated delivery and servicing strategy minimises the daily trips to a total of 41, which is the same as the 2020 consented scheme and one less daily servicing trip than the pre-existing building. The hours of delivery and servicing are restricted between 7am – 10am; 12pm – 2pm; and 4pm – 7pm, prioritising pedestrian comfort during peak hours of the work day from Mon – Fri. No deliveries or servicing will be carried out using 10m HGVs, and a maximum of 5 deliveries are to be carried out by 7.5T (3-axle) vehicles which would be required to reverse into the servicing bay. The servicing bay would be fitted with acoustically treated doors which would be closed during loading, unloading and compacting works. The proposed servicing strategy is not materially different than the consented scheme and is an improvement over the pre-existing building which had no planning controls over the number of deliveries, hours of operation, or consolidation requirements. which would require reversing into the loading bay at New Union Street.
368. The draft City Plan 2040 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to no servicing at peak times 0700-1000, 1200-1400, and 1600-1900, in line with the City of London Transport Strategy, as well as no servicing between 2300-0700 as recommended by Environmental Health Officers (discussed in Noise section below), and no vehicles reversing after 2100. Cargo bikes would be permitted to access the proposed internal off-street servicing area whilst vehicular access to the site is restricted.
369. The development is required to produce a delivery and servicing plan (DSP), and this would be secured by a Section 106 obligation.

Construction Logistics

370. The submission of a deconstruction logistics plan and construction logistics plan is to be secured by condition. The logistics arrangements should be developed in consultation with the City's Highways Licensing and Traffic Management teams to minimise the disruption to neighbouring occupiers and other highway users.

Pedestrian Comfort and Trip Generation

371. Draft City Plan 2040 Policy AT1 states development proposals should maintain and, wherever feasible, provide for an increase in pavement widths to ensure that pavements provide sufficient safety, comfort, and convenience for the number of pedestrians using them. Transport for London's Pedestrian Comfort Guidance recommends a minimum Pedestrian Comfort Level (PCL) of B+, and the aim in

the City of London Transport Strategy is that all pavements will have a minimum PCL of B+.

372. A Pedestrian Comfort Level (PCL) assessment has been included in the submitted Transport Assessment to determine the existing and proposed comfort levels at three points: 1) pedestrians walking along Moorfields at the site's frontage, 2) entering City Point Plaza from Moorfields and 3) walking along New Union Street.
373. PCL Assessments range between A to E, thus presenting differing levels of suitability, categorised as comfortable, acceptable, at risk and unacceptable/uncomfortable. The worst-case scenario for the existing situation is along Moorfields (B), whereas with the proposed development, Moorfields would achieve 'A', representing an improvement to pedestrian comfort to this key thoroughfare. All locations in the proposed scenario would achieve minimum pedestrian comfort of 'A' without the S278 pavement widening works, which is positive. The pedestrian comfort levels are in line with Transport for London's Pedestrian Comfort Guidance and draft City Plan 2040 Policy AT1.
374. The submitted transport assessment details a multi-modal trip generation assessment comparing the proposal with the 2020 consented scheme, for peak morning and evening hours. It is predicted that the total number of trips to the development would be 1514 per day, which is an increase compared to that of the 2020 consented scheme at 1280. It is predicted that the total number of trips to the development in the AM peak hour (0800-0900) would be 725, which is an increase of 112 trips in this period. It is predicted that the total number of trips to the development in the PM peak (1700-1800) would be 789, which is an increase of 122 in this period. Based on the assessments the applicant has undertaken, including rail line loading capacity, PCL and bus capacity assessments, the impacts associated with the proposed development on the surrounding transport network are considered to be negligible, due to the modal split of travel at peak times and the numerous options of travel in close proximity to the site.
375. The transport assessment indicates that the overall increase in trips across all modes to and from the site during the AM and PM peak hours from that of the 2020 consented scheme, with the principal increase being an additional 122 public transport trips during the PM peak; and would have a minimal impact on the surrounding highway and public transport network capacities.
376. Part of the s.278 works include the widening of the footways and improvements to Moorfields (which are also part of the City of London's Healthy Streets Plan). The scope of the s.278 works is further outlined in the sub-sections below. These works would further improve pedestrian comfort around the Site.

Refuse and Recycling

- 377. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.
- 378. The refuse/recycling collection is proposed from the servicing yard, accessed from New Union Street. Swept paths showing movements for vehicles associated with refuse/recycling on the servicing yard area are included in the submitted Transport Assessment, and are considered acceptable.
- 379. Similar to other deliveries for the development, refuse vehicles would also need to pre-book a delivery slot to ensure no conflicts with delivery/servicing activities. The refuse storage is on the same level as the servicing bay at lower ground floor level.
- 380. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facility complies with their requirements.
- 381. To ensure no conflicts arise between the delivery/serving and refuse collection, and there is no waiting on the public highway, details of the refuse and recycling storage have been requested via condition, in accordance with policies DM17.1 and DM16.5 of the Local Plan.

Hostile Vehicle Mitigation (HVM)

- 382. Local Plan 2015 Policy DM3.2, the draft City Plan 2040 Strategic Policy S2 (Safe and Secure City), and Policy SA3 (Designing in Security) set out how appropriate security and safety provision must be incorporated into all development. Policy D11 (Safety, security, and resilience to emergency) of the London Plan states development proposals should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity, and help mitigate its effects.
- 383. Security proposals to protect the building and the new areas of public realm have been developed in consultation with the Designing Out Crime and the Counter Terrorism security officers within the City of London Police.
- 384. The HVM would mainly be within the façade of the building through structural reinforcements, with some bollards located externally at the entrance to City Point Plaza from Moorfields. No HVM is located on the public highway.
- 385. Planters within the plaza are proposed which would serve a dual purpose in both enhancing the environment and providing a visual deterrent to hostile vehicles, as well as a physical barrier to hostile vehicles wishing to enter the Plaza.
- 386. Final details of HVM measures are required by condition.

Open Space and Permissive Path

387. The land around and across the site has a variety of designations.
388. There are elements of City Walkway to the west of the site, across the entrance to New Union Street from Moor Lane, and into one of the City Point covered walkways.
389. Permissive path, that is areas of private land to which the public have access to pass and repass over at the discretion of the landowner, surrounds the site to the north and south, covering almost all of City Point Plaza and New Union Street. The area above the car park access ramp from Moorfields is excluded from the permissive path designation at present.
390. Moorfields is public highway and covers the pavement crossover used to access the car park access ramp.
391. There is no public highway on or around the site that would require stopping up as a result of the proposals. The building line is proposed to be pulled back from the public highway on Moorfields and as such it is proposed to provide this additional area of land within the applicants' private ownership as permissive path, save for a thin strip of land directly adjacent to the eastern façade of the proposed building for the setting out of tables and chairs for the associated Class E(a/b) unit. The distance between the building line and the carriageway would be 7.3m, and the distance between the building line and the back edge of the pavement (i.e. ownership boundary and building line of pre-existing building) is 3.3m. This means that the pavement would be 3.3m wider than the existing, without any additional pavement widening measures to be secured through the S278 in place. A total of 126.6sq.m of permissive path is to be removed as a result of the proposals, namely areas along New Union Street, and a total of 156.9sq.m of new permissive path is to be dedicated, giving a net increase of 30.3sq.m of permissive path. This would be secured through S106 obligation.
392. A "Fraternity Agreement" was made in 1962 between the City Corporation and the then owners of the land (the Master and Wardens of the Merchant Taylors of the Fraternity of St. John Baptist in the City of London), with the agreement being made under the provisions of the Open Spaces Act 1906. It was entered into as part of the overall development of City Point (then known as Britannic House) and the owners agreed to lay out the land so as to enable the public to have access to the open space. The owners were not permitted to place any "structures" on the open space without the consent of the City Corporation. The agreement also requires the owners to "maintain... an open space or open spaces having an area or aggregate of areas of at least thirty-six thousand square feet".
393. In 1999, a supplemental agreement came into effect, made between the then owners of the land and the City Corporation. This agreement was made to permit, in connection with the further development of City Point, the open space

established in the 1962 Agreement to be 'reconfigured' by the installation of structures within the permitted open space.

394. In 2017, a further agreement was made between the City Corporation and the landowners, which carried forward the requirement for thirty-six thousand square feet of open space laid out in the 1962 Agreement, but was also used to vary the layout of the open space from the 1999 agreement. As such the 2017 agreement superseded the 1999 agreement, but the 1962 Agreement remains in place today.
395. The application proposes to add to the minimum of 36,000 sq.ft of open space within the Plaza as required by the 1962 Agreement. No further stopping up or loss of open space is required as part of the proposals. The applicant, however, must enter into a second 'Supplemental Agreement' to confirm the second reconfiguration of the permissive open space and the "structures" to be placed upon it, notably the proposed planters in the plaza.
396. An additional 1340sq.ft [124.5sq.m] of Open Space pursuant to the 1962 Open Space Agreement would be provided as part of the proposals from the infilling of the car park ramp and a small amount outside the proposed community space, resulting in a total of 38,530sq.ft of Open Space. This would be secured by S106 obligation requiring the owner to vary the 1962 Open Space Agreement and to comply with the covenants contained within the deed.
397. The increase in permissive path of 30.3sq.m and the increase in Open Space of 124.5sq.m is welcomed. The infilling of the carpark ramp and associated landscaping improvements to the Plaza, as well as the wider public realm works to New Union Street and Moorfields would provide an improved visual appearance around the Site through the verdant greening, as well as environmental benefits including an enhanced Urban Greening Factor. It would also provide pleasant dwell spaces for users of the plaza, a significant betterment over the current hardstanding in place.

Section 278 Agreement

398. Should this application be approved, the applicant is required to enter into a Section 278 agreement with the City of London.
399. The Section 278 agreement would include (but would not be limited to):
- Repaving of footways, re-alignment of carriageway, and accommodation works to suit new site layout on Moorfields and Moor Lane.
 - Resurfacing of the carriageway on Moorfields.
 - Removal of existing crossover and reinstatement of footway, following the removal existing ramp to basement.
 - Provision of road markings and associated traffic orders.

- Provision of at least one on-street disabled parking bay with electric charging points if feasible.
 - Removal of redundant street furniture, if applicable.
 - Any highways repair and reinstatement works in the vicinity of the site, as impacted by construction works; and
 - Any other works reasonably necessary to make the Development acceptable.
400. The Section 278 works would be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision. This would be secured through the Section 106 agreement.

Highways and Transport conclusion

401. The proposal would accord with the relevant transportation related policies including London Plan policies T5 cycle parking, T6 car parking, T7 deliveries, servicing and construction, and D11 Safety, security, and resilience to emergency. It accords with the Local Plan 2015 Policies DM3.2 and DM16.5, and the draft City Plan 2040 Policies AT1 – 5, SA3, VT2, and VT3.
402. The delivery and servicing strategy for the proposed scheme is consolidated to 41 deliveries per day, with AM, PM and lunch peak hour restrictions, where no deliveries are carried out by 10T HGVs. A total of 5 deliveries per day would be undertaken by 7.5T 3-axle vehicles, which would be required to reverse into the loading bay but would fit comfortably inside with the acoustic doors closed, thereby minimising impacts from noise from the reversing of large vehicles. The remaining 36 deliveries would be carried out by smaller vans and motorcycles. This delivery and servicing strategy is considered acceptable and in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

Environmental Impact of Proposals on Surrounding Area

403. 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 2040 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

404. 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 developments should avoid unacceptable wind impacts.

405. Wind tunnel testing has taken place to assess 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 Microclimate Guidelines for Developments in the City of London.
406. 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 conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.
407. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
408. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
409. Because the proposed building is over 50m AOD, both Computational Fluid Dynamics (CFD) and Wind Tunnel Testing have been undertaken by independent experts.
410. The wind tunnel and CFD results broadly give the same assessment results. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.
411. The applicant has undertaken the following configurations in both the CFD and Wind Tunnel Test, all at ground level, at proposed development entrances, and to the private roof terraces and balconies in the proposed development:
 - Baseline – cleared site with existing surroundings;
 - Proposed development with existing surroundings; and
 - Proposed development with cumulative surroundings.

412. The Wind Tunnel Test also included the proposed development with existing surrounds and existing and proposed landscaping.
413. The City of London is characterised in part by a collection of tall commercial buildings of differing geometries and shapes. Tall buildings naturally create an obstruction to the strong upper-level winds and can increase the windiness in their surroundings. The magnitude of this impact depends on the design of a proposed scheme, in particular its size, shape, orientation and architectural features.
414. The City of London Lawson criteria defines the safety limit as a once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK, and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe.
415. There are four criteria for determining the sensitivity of a receptor:
- High: seating areas, entrances, and terraces
 - Moderate: thoroughfares
 - Low: high pedestrian traffic thoroughfares
 - Negligible: roads and areas of no pedestrian access

Existing Baseline Conditions

416. The 'cleared site' baseline conditions include the pre-existing 11-storey building demolished down to ground level, save for the Pret a Manger unit to the west of the Site.

Ground Level comfort – windier season

417. The surrounding streets generally show 'occasional sitting' and 'standing' comfort criteria in the windier season, with localised 'walking' only experiences. New Union Street experiences conditions suitable for 'occasional sitting'. All surrounding streets experience comfort criterion suitable for their intended activities as thoroughfares, in line with the CoL Lawson Criteria.
418. The majority of entrances to neighbouring buildings and bus stops experience 'occasional sitting' and 'standing' comfort criteria, which are suitable for their intended uses.
419. 70 Finsbury Pavement, to the north of the Site, experiences 'walking' conditions at the public entrance to the retail unit. This is therefore unsuitable for its intended use in the baseline scenario.
420. The public passageways through City Point experience wind conditions suitable for 'walking' activities, which are not suitable for their intended use.

Ground Level comfort – summer season

421. The surrounding streets generally show 'occasional sitting', 'frequent sitting' and 'standing' comfort criteria, which are suitable for their intended uses as thoroughfares.
422. All entrances to neighbouring buildings experience 'occasional sitting' and 'standing' conditions, which are suitable for their intended use.
423. One seating area on the north side of City Point Plaza experiences 'standing' comfort criteria in the baseline scenario, which is not suitable for its intended activities. However, all other nearby seating areas experience 'occasional sitting' comfort criteria in the summer months which is suitable for their intended use. City Point Plaza as a whole experiences 'occasional sitting' conditions, which is suitable for seating areas and suitable for its use as a public thoroughfare.
424. The areas of 'walking' comfort within City Point building are reduced but still exist in the summer season.
425. There are no safety exceedances on or off site in the annual baseline results.

Proposed Development with Existing Surrounds

Ground Level comfort – windier season, off-site

426. In the proposed development with existing surrounds scenario, the proposed development would have a negligible impact on surrounding streets which generally retain their 'occasional sitting and standing' comfort levels. There is also an increase in areas suitable for 'frequent sitting' to the north of the site in City Point Plaza, which is a negligible improvement.
427. The localised areas of 'walking' comfort in the baseline scenario remain unchanged, and as these areas are within thoroughfares, they are and remain suitable for their intended uses.
428. 70 Finsbury Pavement continues to experience 'walking' conditions at the public entrance to the retail unit as in the baseline scenario.
429. The areas of 'walking' comfort within City Point building are unchanged over the baseline scenario.
430. The reduction in height of the building from that originally submitted has not had a noticeable impact on the results.

Ground Level comfort – windier season, on-site

431. The proposed entrances to the development would experience conditions suitable for 'frequent and occasional sitting' which are suitable for their intended use.
432. New Union Street, which becomes a covered walkway as part of the proposed development, would experience 'occasional sitting' and 'standing' comfort, which is suitable for its intended use as a thoroughfare.
433. The reduction in height of the building from that originally submitted has not had a noticeable impact on the results.

Ground Level comfort – summer season, off-site

434. The streets surrounding the Site would generally experience comfort levels of 'occasional sitting' and 'standing' activities, with an increase in area suitable for 'frequent sitting' immediately around the site. These conditions are suitable for the intended uses.
435. All entrances for off-site buildings would experience wind conditions suitable for 'occasional sitting' and 'standing' activities, which is suitable for the intended uses.
436. Most off-site public seating areas would experience 'occasional sitting' comfort in the summer months, which is suitable for the intended use. One seating area would experience 'standing' comfort conditions, but this is the same as the baseline scenario. The proposed development therefore would have no impact on this area.
437. The reduction in height of the building from that originally submitted has not had a noticeable impact on the results.

Ground level comfort – summer season, on-site

438. On-site entrances to the proposed development would feature 'frequent and occasional sitting' comfort, which is suitable for the intended uses.
439. City Point Plaza would experience 'frequent sitting' comfort, which is suitable for uses such as restaurants, cafes and amenity spaces. As City Point Plaza is a public amenity space, and as in the baseline scenario this is 'occasional sitting', the proposed development would have a moderate level beneficial impact on the wind comfort conditions around the Plaza.
440. The reduction in height of the building from that originally submitted has not had a noticeable impact on the results.

Proposed development terraces and balconies

441. The wind conditions on the terrace on the proposed building are largely suitable for 'occasional sitting' and 'standing' activities, and a very small area of 'walking' comfort is observed to the northwest of the 14th floor level terrace. This area was slightly larger in the originally submitted scheme, but the amendments to reduce the height of the building have reduced this area to virtually imperceptible. This is assessed without any proposed landscaping in place.
442. A very small area of safety exceedance is observed in the same region as the 'walking' comfort conditions to the northwest of the 14th floor level terrace on an annual basis. Similarly to the comfort levels, the area of safety exceedance was slightly larger in the originally submitted scheme, so the reduction in height has had a positive impact to the safety of users of the 14th floor terrace through a reduction in the area where the safety exceedance persists without any landscaping in place. The 2.5m screen around the 14th floor terrace would also help to mitigate any potential adverse impacts from wind to users of the terrace. In addition, wind mitigation through the intensive landscaping is recommended and to be secured through condition.
443. With regards the private balconies to the east elevation, the wind conditions are suitable for 'frequent sitting' activities and are therefore suitable for their intended use. There are no safety exceedances observed on the balconies.
444. The 19th floor south facing terrace would see primarily 'frequent sitting' comfort criteria with some isolated instances of 'occasional sitting'. This is suitable for the terraces' intended use.
445. The reduction in height of the building from that originally submitted in this instance has had a beneficial impact on the results.

Proposed Development with cumulative Surrounds

446. The wind conditions for off-site areas remain largely unchanged with the proposed development in place with the cumulative surrounds in both summer and windier seasons.
447. The private terrace and balconies on the proposed development itself would remain the same as the proposed development with existing surrounds scenario.

CFD versus Wind Tunnel Test results

448. As the proposed building is over 50m AOD, a Wind Tunnel Test has also been undertaken in addition to the CFD results outlined above.

449. Overall, there is general accordance with each other for ground level comfort in the windier season for both on and off-site receptors.
450. In the summer months at ground level, the results are generally in line with each other. However, there is a small area of discrepancy around the walkways through City Point building. The CFD results show slightly more areas of 'walking' comfort than the WTT results; the discrepancy is due to the modelling of the covered passageway heights. The actual comfort levels for this region is expected to be somewhere between the two assessments results, and as these are apparent in the baseline scenario, the proposed development is not at fault and overall would have a negligible impact on the comfort levels in this area.
451. For the terrace levels, the results are the same for CFD and the WTT.
452. The Wind Tunnel Test also tested a fourth configuration; the proposed development with existing surrounds and with existing and proposed landscaping/wind mitigation measures.
453. This shows that with the inclusion of the proposed landscaping in place, areas of café style seating at ground level in the plaza (to the west at the junction between the proposed building and City Point walkways) would persist with windier than suitable conditions in the summer season and therefore additional mitigation measures over and above the proposed landscaping would be required. This is secured by condition.
454. With the inclusion of the landscaping at terrace levels, there would be an overall improvement in wind conditions, although some isolated instances of comfort levels below the requirements for seating areas would persist. Wind mitigation measures are recommended.
455. The wind mitigation measures recommended by the RWDI in the Wind Tunnel Test report include 1.2m tall dense planting or screening around seating areas; additional 3m tall deciduous or evergreen trees within the seating area; a 3m tall pergola structure of at least 50% porosity; or the relocation of the seating along the east of the terrace, in locations with frequent sitting use comfort levels. These mitigation measures would be secured through detailed design of the landscaping to the terrace via condition.

Wind Microclimate Conclusion

456. Overall, the wind microclimate impact of the Proposed Development with proposed landscaping is considered to be acceptable. The reduction in height and revised design to the uppermost elements of the building from those originally submitted have a beneficial impact on the 14th floor terrace roof conditions, and a negligible impact on the ground level conditions as detailed above.

457. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the Local Planning Authority, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the assessments.
458. 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 2040 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 and Overshadowing

459. 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.
460. Local Plan 2015 Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.
461. Draft City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings, other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces is appropriate for its context and provides acceptable standards taking account of the Building Research Establishment's guidelines.
462. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the Draft City Plan 2040 states that when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.
463. 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

464. 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.
465. It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels can appear to have a disproportionate impact. To give a more complete picture the same level of change can be described in two ways:
- Percentage change - 10% reduced to 8% = 20% reduction
 - Actual change - 10% reduced to 8% = 2% reduction

Overshadowing

466. 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

467. 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 DE7 of the draft City Plan. Policy D6(D) of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether 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.

468. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the submitted Daylight, Sunlight and Overshadowing report prepared by Point 2 Surveyors. 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 DE7) it is appropriate to have regard to the assessment carried out in accordance with the BRE guidelines.
469. 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 in 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. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premises, it would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10.

Daylight and Sunlight

470. 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.
471. 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).
472. Both the London Plan 2021 and Local Plan 2015 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered when considering any reductions in daylight and sunlight assessed under the BRE methodology.
473. With regards to sunlight, guidance states that a window/room would technically fall below the guidance for sunlight if (a) the room receives less than 25% APSH and experiences more than a 20% change to annual sun, or less than 5% WPSH and more than a 20% change to winter sun; and the same room has a reduction in APSH of 4% or more. Both criteria need to be met for the window/room to fail.
474. The assessment supplied has focused on three scenarios for all tests:
- (1) The likely effects of the proposed development against a baseline of the pre-existing 11-storey Tenter House;
 - (2) The likely effects of the proposed development against a baseline of a cleared site; and
 - (3) The likely effects arising in the context of a cleared site against the likely effects identified as a result of the 2020 scheme. The impact would be considered to be noticeable and material if, when comparing the 2020 scheme with the proposed scheme:

- a) A window experiences an absolute difference in VSC of 3% or more;
- b) A room experiences more than a 1% absolute change in winter sunlight and more than a 2% absolute change in annual sunlight from the results associated with the consented/implemented scheme.

Willoughby House

475. Willoughby House is located approximately 70m to the west of the proposed development and contains residential accommodation across seven floors. The majority of the windows facing the Site serve bedrooms save for the top floor of the building which are mainly living rooms.

Pre-existing (11-storey) site vs proposed development

476. In the pre-existing 11-storey building versus proposed development scenario, 202 out of 334 windows meet the BRE VSC criteria with balconies in place. In the without balcony scenario, 100% of the windows meet the BRE VSC criteria.
477. With regards NSL for this scenario, 195 out of 231 rooms would meet the BRE criteria with the balconies in place. Without the balconies, 221 out of 231 rooms would meet the criteria. Of the 10 that fail, they are all bedrooms and all under 29% losses, which are minor.
478. With regards sunlight, for this scenario 185 out of 231 windows facing within 90-degrees of due south with balconies included meet the BRE criteria for APSH. On the without balcony basis, 100% of windows meet the criteria.

Existing (cleared) site vs proposed development

479. In the baseline condition and with regards daylight, 194 out of 334 windows facing toward the Site would meet the VSC criteria. Of the windows that fail, 17 would see minor alterations (20-30% loss), a further 31 windows would see moderate losses (30-40%), and the remaining 92 windows would see major losses of >40%.
480. Based on the known internal layouts of Willoughby House, 126 of the windows that fail serve bedrooms which have a lesser requirement to daylight than primary living spaces.
481. With regards to NSL in the baseline versus proposed, 191 out of 231 rooms tested meet the BRE criteria, with 22 rooms seeing minor changes (20-30%), 12 seeing moderate changes (30-40%), and 6 rooms seeing major changes (>40%).
482. With regards to sunlight, 231 rooms within the east facing elevation of Willoughby House have been tested, of which 170 meet the criteria.

483. BRE guidance states, "Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight. One way to demonstrate this would be to carry out an additional calculation of the VSC and area receiving direct skylight, for both the existing and proposed situations, without the balcony in place this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of light."
484. In accordance with the recommendations of the BRE Guidance, calculations have been undertaken which discounts the effects of the overhanging balconies for all the windows within Willoughby House. The results show that all the windows fully comply with the BRE criteria for VSC. The windows would experience no more than a 13% reduction, which illustrates that it is the presence of the balconies rather than the mass of the proposed development that is the main factor for the loss of light.
485. When considering NSL in the alternative 'without balcony' assessment, 221 out of the 231 rooms would meet the BRE criteria. Of the ten remaining rooms, all would experience a 'minor' loss. Further, nine of the ten rooms that fail serve bedrooms, which are less important than main living spaces in terms of NSL. The one LKD that fails would see an alteration of 20.3% over the former value, which is only just in the minor category and is unlikely to be highly perceptible.
486. The alternative without balconies scenario has also been considered for the sunlight assessment due to the BRE Guideline stating: "*Balconies and overhangs above an existing window tend to block sunlight, especially in summer above south facing windows Even a modest obstruction opposite may result in a large relative impact on the sunlight received*".
487. In the without balcony scenario for sunlight, all 231 rooms tested within Willoughby House fully comply with the BRE guidelines for APSH.

Permitted 2020 scheme versus Proposed Development

488. As the existing (cleared baseline) scenario is temporary, it is reasonable to assess the effects of the currently proposed development against those previously consented (and in the process of being implemented).
489. As above, this alternative criteria suggests that an additional material impact may be seen over the consented scheme if a window experiences an absolute difference in VSC of 3% or more (known as the Buckle Street criteria).
490. When considering the VSC results for Willoughby House in this assessment, all windows would see less than a 3% absolute reduction, and therefore is considered virtually imperceptible to occupiers, as established by the Buckle

Street appeal decision. The largest alteration above and beyond the 2020 scheme is an absolute loss of 1.04%.

491. For NSL, in the with balcony scenario, only 3 additional rooms would see losses in the proposed scheme over the consented of more than 20% (although all less than 24%). In the without balcony scenario, 100% of rooms tested would not see a material reduction over the consented scheme.
492. When considering sunlight (APSH), only one room tested within Willoughby House would see a material alteration beyond the 2020 scheme for winter sunlight, which serves an LKD. For annual sunlight, 48 rooms would see an alteration of more than 2% in the annual sunlight test. However, 44 of these rooms are known to be bedrooms which the BRE guidelines state that bedrooms are less important for sunlight than main living spaces.
493. The tests above were carried out with balconies in place. The applicant also tested the absolute reduction over the 2020 scheme on a without balcony scenario to ensure consistency.
494. For VSC and without balconies, no windows would see a change beyond those approved in the 2020 scheme. For sunlight, as above only one room would see a material change beyond the 2020 scheme for winter sunlight. 50 rooms would see an alteration of more than 2% APSH over the consented scheme, but 46 of those rooms are bedrooms.
495. It should also be noted that on the without balcony scenario, the amount of retained sunlight is well above the recommendations in the BRE guidelines, being 25% for annual sunlight, and all rooms retaining over 30% APSH.

Overshadowing

496. The applicants have undertaken a detailed sun on the ground assessment to consider the extent of any overshadowing to City Point Plaza.
497. The BRE guidelines recommend that at least half an amenity area should receive 2 hours of sunlight on March 21.
498. City Point Plaza is a poorly lit open space as existing, overshadowed by surrounding buildings including City Point, 21 Moorfields, and 20 and 22 Ropemaker Street.
499. In the pre-existing scenario, with the 11-storey Tenter House still standing, this remained the same. The 11-storey Tenter House blocked midday sun, Moorfields House blocks out morning sun and City Point obstructs afternoon sun.

500. In the pre-existing (11-storey) scenario, only 5.2% of the Plaza received 2 hours of sunlight on the 21st March. In the baseline (cleared site) scenario, this was slightly increased to 5.9% of City Point Plaza receiving 2 hours of sunlight on the 21st March, with the small part that is well sunlight being restricted to the northern part of the plaza.
501. When considering the 2020 permitted scheme, all areas of well-lit space were removed, so 0% of the plaza would've received 2 hours of sunlight at the spring equinox.
502. The same result occurs with the proposed scheme; 0% of the plaza would see 2 hours of sunlight at the spring equinox. Therefore, it can be concluded that there is no material impact of the proposed development over and above that which has already been approved as part of the 2020 scheme, and even then, the Plaza was not a well-lit space to begin with.
503. A number of objections have been received with regards the overall daylight, sunlight and overshadowing impact of the proposed development, and in particular a request for transient overshadowing results was received. In response and to aid assessment, the applicant has provided transient overshadowing results for City Point Plaza, showing results for the 21st June.
504. On this date, in the pre-existing (11-storey) scenario, 69.6% of the Plaza received at least 2 hours of sunlight. In the cleared site (baseline) scenario, this figure increased to 99.5%. In the consented scheme scenario, 55.7% of the plaza would receive at least 2 hours of sunlight. With the new proposals in place, this figure would experience a minor drop to 50.1% of the plaza receiving at least 2 hours of sunlight on 21st June.
505. Whilst this does show a slight reduction compared to the permitted scheme, a near majority of the plaza (just over the 50% target) would continue to enjoy 2 or more hours of direct sunlight on the 21st June, when it is likely that the space would be used more. Overall, the use and enjoyment of the space would not be materially altered over the permitted scheme as a result of the proposed development.
506. It is acknowledged that there would be a noticeable loss of sunlight provision to City Point Plaza, however the space itself is not very well sunlit in the existing situation. On March 21 only a small area of the at the north of the plaza receives a reasonable amount of sunlight in the pre-existing scenario, and this reduces to 0% in the 2020 permitted scheme and is replicated now. However, in summer months, when the Plaza is likely to be used more widely, a near majority of it would continue to receive more than two hours of sunlight, slightly exceeding the 50% target as set by the BRE guidelines.

507. The applicant has also provided transient overshadowing results which details the shadow path of the proposed scheme throughout the day in March, June and December.
508. On 21st March, the results for the consented versus proposed scheme are broadly similar throughout the day; at 08:00 and 09:00 there would be slightly more shadow cast to properties to the north of Willoughby House as a result of the proposed massing. However, this would not be harmful as outlined above in the context of the other daylight and sunlight criteria tested. From 11am to 2pm there would be slightly more shadow cast to City Point Plaza from the proposed scheme than the consented, but again as above the Plaza is a poorly lit space in the baseline.
509. On 21st June, the results between the consented scheme and the proposed scheme are broadly similar, with slightly more shadow cast to City Point Plaza in the middle of the day.
510. On 21st December, the consented versus proposed results are comparable throughout the day.

Daylight and Sunlight Conclusion

511. Despite the dense urban location of the Site, the vast majority of alterations to the daylight and sunlight amenity of the surrounding residential properties are either in full compliance with BRE guidance or are considered to be no greater than minor adverse in nature.
512. In respect of the few residential rooms that do experience effects which depart from BRE guidance, these are predominantly bedrooms, and located under large balconies serving rooms to the floors above them.
513. BRE guidance states that existing windows with balconies above them typically receive less daylight and sunlight because the balcony reduces visibility of the top part of the sky. As such, even a modest obstruction opposite these windows may result in a large relative impact upon on the VSC, APSH and NSL. The BRE suggests that, in order to demonstrate that it is the presence of the balcony rather than the size of the new obstruction that is the main factor in the relative loss of daylight and/or sunlight, additional daylight and sunlight calculations should be carried out for both the existing and proposed situations without the balconies in place.
514. These assessments were carried out and, as indicated by the BRE, they demonstrated that it is the presence of the balconies, rather than the size of the proposed development that is the main factor in the relative loss of daylight and/or sunlight.

515. The impact on sunlight in City Point Plaza has been assessed as moderate adverse. There would be a noticeable loss of sunlight provision, but the space itself is not well sunlit in the existing situation nor in the consented scheme. On March 21, only the seating at the north of the plaza receives a reasonable amount of sunlight; and this would be lost as a result of the proposed development, which is the same as the consented scenario. On June 21 at least 50% of the plaza would continue to receive a minimum of 2 hours of sunlight in the proposed scenario.
516. By virtue of the limited impact of the proposed development on the daylight and sunlight received by the neighbouring residential occupiers and the amount of sunlight received by the City Point Plaza, it is considered that the proposals are in compliance with policies DM10.7 and DM21.3 of the Local Plan, policy DE7 of the draft City Plan 2040, and policy D6(D) of the London Plan.

Solar Glare and Light Spill

517. The BRE Guidelines recommend that solar glare analysis be carried out to assess the impact of glazed facades on road users in the vicinity. Policy DM10.1 of the Local Plan and policies S8 and DE8 of the draft City Plan seek to ensure that developments address and do not have any intrusive solar glare impacts on the surrounding townscape and public realm.
518. The applicant has provided a note prepared by Point 2 Surveyors that has qualitatively assessed the proposal's potential for solar glare issues that would warrant a full assessment, and considers that there would be a very low likelihood of the development creating any solar glare related issues. There are no train lines that pass the site or have a view of the proposed scheme (all railway lines that service Moorgate Station immediately to the south of the site are underground). Given the location of the Site within City Point Plaza and surrounded by larger commercial buildings, any road junctions, traffic lights and crossings in the vicinity are at some distance away and are otherwise likely to be blocked by neighbouring development. Even at the main junction of South Place/Ropemaker Street and Moorgate, which is to the north of the Site, the view a driver would have of the Site as it approached the junction would not be direct and as such solar glare is unlikely to cause an issue as the building is to one side of the field of view.
519. The proposed design of the building does not feature any concave facades so solar convergence would not be relevant in this instance. The building is also not highly glazed, featuring a mixed precast concrete framed exoskeleton design with timber window detailing throughout, which is non-reflective.
520. Given the orientation, design and materiality of the building, officers are satisfied with the applicant's assertions. Notwithstanding, should planning permission be

granted, a clause would be included within the S106 agreement that would require a post completion solar glare assessment to be submitted if requested by the City. This would include details of any mitigation measures if considered necessary. In light of the information provided and the S106 clause it is not considered that the development would result in any undue solar glare issues and would therefore accord with policy DM10.1 of the Local Plan and policies S8 and DE7 of the draft City Plan.

521. Local Plan Policy DM15.7 and draft City Plan 2040 policy DE8 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.
522. New lighting is proposed in internal and external parts of the development. A condition is recommended requiring a lighting strategy for internal, external and semi external lighting, which would include details of levels and how the lighting has been designed together with management measures to reduce glare and light trespass. As submitted, the Applicant has outlined a number of measures to reduce and mitigate light spill and visual discomfort to neighbouring properties, including keeping internal luminaires a minimum of 1.5m away from the façade edge, using luminaires with good optical control to mitigate visual glare and discomfort, and utilising a smart control system to dim or switch off the luminaires outside office operation hours.
523. Subject to the recommended condition, the proposed development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE8.

Thermal Comfort Assessment

524. London Plan Policy D8 and D9 and the emerging City Plan 2040 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.

525. 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.
526. 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.
527. Three configurations have been assessed, including; the existing site (cleared baseline) with existing surroundings, the proposed development with existing surroundings, and the proposed development with cumulative surroundings.

| 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 |

Cleared site with existing surrounds

Public Ground Level

528. The overall (annual) comfort category for Moorfields and the west entrance to New Union Street is 'seasonal' which is suitable for outdoor dining in spring and autumn seasons. For the remaining areas tested, including City Point Plaza, the overall comfort is 'all-season' which is suitable for year round amenity use.

Proposed development with existing and cumulative surrounds

Public Ground Level

529. City Point Plaza would continue to 'all-season' comfort in both the proposed development versus existing and proposed development versus cumulative surrounds scenarios. The annual comfort to the south-west of the site (along Moor

Lane) would see an improvement from mostly seasonal conditions to mostly 'all-season' comfort.

Proposed private roof terraces and balconies

530. Roof terraces typically experience greater exposure to sunlight and wind than street level amenity areas. The results from the proposed development versus existing and cumulative surrounds show that the private terraces on the development would achieve 'seasonal' and 'all-season' comfort for terraces on the lower levels (wraparound terrace at level 14), which is suitable for outdoor dining and amenity use, while upper terraces (at level 20 facing south over 21 Moorfields) achieve 'all-season' comfort all year round.
531. The balconies on the proposed development, notably those on the east elevation, would achieve 'all-season' comfort.

Thermal Comfort Conclusion

532. It is considered that the thermal comfort in and around the site would be acceptable and in accordance London Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Noise, Disturbance and Vibration

533. London Plan Policy D13 required proposed developments to mitigate noise-generating uses and policy D14 aims to avoid significant adverse noise impacts on health and quality of life. Local Plan policies DM3.5 and DM15.7 seek to ensure that operational noise does not adversely affect neighbours. Policy DM21.3 of the Local Plan states that noise-generating uses should be sited away from residential uses where possible, and where required noise mitigation measures must be provided. Policies S1, HS3 and HL3 of the draft City Plan 2040 require that noise does not adversely affect nearby land uses, supporting a healthy and inclusive City.
534. The impact of the proposed development in terms of noise associated with the operational stage of the office use would be negligible. The impact of the proposed restaurant/café use has the potential for a minor adverse impact to neighbouring noise sensitive receptors, but this could be suitably controlled through the opening hours of the unit, secured by condition and suitable post-planning licenses. The restaurant/café unit has also been located to Moorfields to maximise the separation from the residential properties to the west, thereby greatly reducing any potential noise nuisance.
535. With regard to the proposed roof terraces at level 14 and 19, a condition has been recommended by Environmental Health Officers to restrict the hours of use of these terraces to between 08:00 and 18:00 Monday-Friday and not at any time

on Saturdays, Sundays or Bank Holidays. For the balconies on the east elevation fronting Moorfields, the City's Environmental Health Officer considers that the hours of use can be slightly longer as there are no nearby sensitive residential receptors. As such, the east elevation balconies are restricted from 21:00 to 08:00 Monday to Friday and not at any time on Saturdays, Sundays or Bank Holidays. With these restrictions it is not considered that the use of these terrace areas would have an unacceptable impact on the amenity of nearby residents.

536. With regards noise from mechanical plant, an acoustic report has been submitted with the application. This indicates that plant could be operated without detrimental impact to neighbouring properties in respect of noise and disturbance from vibration. Conditions are recommended to ensure the mechanical plant remains below the lowest background noise level recorded at nearby sensitive receptors.
537. With regards transport and traffic noise, a Construction Logistics Plan is secured by condition to ensure that noise and disturbance is controlled during the construction phases of development and ensure the amenity of nearby sensitive receptors is not detrimentally impacted.
538. Moor Lane is a vehicular access route between Fore Street to the south and Silk Street, Ropemaker Street and Chiswell Street to the north. It provides access/egress to New Union Street (a private service road) and the Barbican carpark ramp beneath Willoughby House. There is a timed restriction for through traffic between the hours of 11pm and 7am Monday to Friday.
539. Concerns have been raised by a number of objectors regarding the noise impact on residents at Willoughby House from servicing traffic on Moor Lane, the 'beeping' of reversing vehicles into the loading bay and loading bay operations.
540. To help mitigate against the break-out noise from the loading bay, it is proposed to include a door on the loading bay so that loading and unloading would take place only when the doors are closed. Details of the door including its appearance and acoustic properties is required by condition. The loading bay is also recessed from the kerb line on New Union Street to minimise disruption to passing pedestrians. The applicant has also stated that they will explore the use of white noise bleepers to be fitted on their delivery vehicles, but this falls outside of planning control.
541. As detailed above in the Highways and Transport section of this report, it is anticipated that there would be a total of 41 delivery vehicles across the proposed operational period of 7am to 11pm with restrictions at peak periods of 7am-10am, 12pm-2pm, and 4pm to 7pm. Of these deliveries, it is anticipated that only 12% (5 vehicles) would be deliveries from HGV's, and none from 10m rigid vehicles, meaning the vast majority of vehicles servicing the development would be able to

enter and exit the servicing bay in forward gear. Delivery trips from larger vehicles required to reverse would be restricted after 9pm.

542. As there are nearby sensitive receptors, it is considered necessary to restrict overnight servicing. As such, a condition is recommended to ensure no servicing of the development shall take place between 23:00 and 07:00 hours Monday to Saturday and between 23:00 on Saturday and 07:00 hours on the following Monday and on Bank Holidays. This is in addition to the normal peak hour daily restrictions on all servicing traffic in the CoL.
543. Overall, subject to conditions, the development would not detrimentally impact on the amenity of surrounding properties in respect of noise, vibration and disturbance. Therefore, the proposed development complies with London Plan policies D13 and D14, Local Plan policies DM3.5, DM15.7 and DM21.3 of the Local Plan, and policies S1, HS3 and HL3 of the draft City Plan 2040.

Air quality

544. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 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 SI1 of the London Plan.
545. The application includes an Air Quality Assessment which includes the likely impact of the proposed development on air quality as a result of the construction and operational phases of the development.
546. During construction dust emissions would increase and would require control through the implementation of good practice mitigation measures in the Construction Method Statements to be approved under conditions attached to the planning permission.
547. The development would be car-free and would utilise ASHPs for operation. Therefore, subject to conditions and obligations, the impacts are considered acceptable.
548. The City's Air Quality Officer has reviewed the proposals and has raised no objections.

549. Subject to conditions, the proposed development would have minimal impact on local air quality. The scheme meets the air quality neutral benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2040, and policy S11 of London Plan which all seek to improve air quality.

Contaminated Land

550. Local Plan policy DM15.8 and draft policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and 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 present potential adverse impacts.

551. Policy S1 of the emerging Draft City Plan expects developers to address land contamination.

552. The application has not been accompanied by a contaminated land assessment. Nonetheless, Environmental Health Officers have reviewed the application and consider that a number of contaminated land conditions are suitable and sufficient to confirm both geotechnical and geoenvironmental ground conditions. Site investigations as part of the contaminated land conditions would need to include shallow and deep boreholes with chemical testing of soils and groundwater, as well as screening of samples for the presence of asbestos. As part of any future investigation the work should also include groundwater and gas monitoring. Overall, the proposals are in accordance with policy DM15.8 of the Local Plan and policies S1 and HL4 of the emerging City Plan subject to condition.

Health Impact Assessment

553. Policy HL9 of the draft City Plan 2040 requires major developments to submit a Healthy City Plan Checklist, or Health Impact Assessment (HIA) to assess potential health impacts resulting from proposed developments.

554. The applicants have submitted an HIA using evidence and assessments of impact within documents submitted with the planning application. The HIA sets out an overall positive impact on health arising from the proposed development and advises on the benefit of adopting strategies that would ensure health impacts are positive, such as a Construction Environmental Management Plan (CEMP) and Travel Plan to encourage sustainable transport modes.

555. There are a large number of residential properties surrounding the development site. The HIA addresses potential disturbance from construction noise for the

neighbouring sensitive receptors and states that the Construction Environmental Management Plan and Demolition and Construction Logistics Plans would enable mitigation of disturbance.

556. The NHS London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool is a generally accepted methodology which is frequently used when assessing a development proposal's contribution to 'Lifetime Neighbourhoods' which provide a safe, healthy, supportive and inclusive living environment for people at all stages of their lives. As noted in the HUDU tool's supporting guidance, there is no single definition of a HIA, and it is recommended that HIAs are localised to the context of the proposal being assessed.
557. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:
- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment.
 - The development would be of a high quality, inclusive and accessible for all.
 - A car-free (except the disabled bays off-site) development minimising vehicles travelling to the Site and reducing emissions
 - The construction and operation of the Proposed Development would also contribute to local economic development, creating new temporary and permanent jobs which in turn would help to address employment-related deprivation – a key wider determinant of health outcomes
 - The provision of improved publicly accessible open space at City Point Plaza would enhance the permeability of the area through level access and would benefit local residents, workers and visitors
 - Building design considering the context of the Site and maximising benefits including employing systems to reduce energy usage and minimise climate impacts as well as being resilient to the effects of climate change
558. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by following the recommendations set out in the Noise Impact Assessment and Air Quality Assessment, and through a Scheme of Protective Works secured by condition.
559. Potential negative impacts identified in the Assessment would be mitigated so far as possible by the requirements of relevant conditions and obligations contained within the S106 Agreement. 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 2040 strategic policy S1.

Impact on residential amenity

560. Local Plan policy DM21.3 and draft City Plan 2040 policy HS3 seeks to protect the amenity of existing residents by resisting uses that would have an undue impact on amenity through noise disturbance, fumes and smells and vehicular

and pedestrian movements likely to cause disturbance. Proposals should be designed to avoid overlooking and protect privacy, day light and sun lighting levels to adjacent residential accommodation. Policies CS5 of the Local Plan and S23 of the draft City Plan 2040 seek to protect the amenity of residents in the north of the City. This section of the report draws together an assessment of the impacts of the scheme on residential amenity.

561. A detailed assessment of the impact of the scheme in terms of noise and disturbance is set out in the Noise, Disturbance and Vibration section of this report. To minimise the impact of noise and disturbance on residents, conditions or S106 obligations are recommended to cover:

- Noise levels from operational plant
- A Scheme of Protective Works to manage dust and noise from the construction of the development
- A Community Space Management Plan to limit the impact of any use of the community space after office hours including dispersal
- Control of noise levels from the terraces including limitations to loud music and promoted events
- Hours of operation of the terraces and retail unit

562. The scheme has been assessed with regard to daylight, sunlight, overshadowing, solar glare and light spillage as is set out in the relevant section of this report. There would be some minor adverse impact to residential properties in Willoughby House (Barbican) but this is primarily caused by the balconies on those properties themselves rather than the mass and height of the proposed development. Notwithstanding, when compared to the pre-existing building, the consented scheme and the baseline (cleared site), it is considered that a good level of daylight and sunlight would continue to be experienced by these properties. Subject to further details in respect of the design of the building facades and a lighting strategy being secured by condition, it is not considered that the proposal would have any undue impact in respect of solar glare or light spillage. Residential amenity has been considered in the Lighting Strategy Planning Statement by MBLD. Proposed mitigation measures, including designing the interior lighting in line with the requirements of the City Environmental Zones as outlined in the Lighting SPD would be secured through condition.

563. The proposed building features a number of roof terraces and balconies for use by the building tenants, including a large 'wraparound' terrace at 14th floor level, a smaller terrace at level 19 facing south to 21 Moorfields, and a number of smaller balconies on the east elevation facing Moorfields. There are no balconies or terraces on the west elevation facing residential properties in the Barbican. The 14th floor level terrace would extend over the western volume of the building, close

to the Barbican. However, it is intended that this be extensively greened at its perimeter for both suicide prevention measures but also to reduce the amount of usable terrace at the balustrade line, creating a natural barrier to reduce overlooking to residential properties from this terrace. The 2.5m screen around the 14th floor terrace would also assist in reducing the impact from noise from the terrace to nearby properties. Control over the hours of use of the terraces is also secured through condition, limiting the hours that the 14th and 19th floor terraces could be accessed to between 8am and 6pm, and the balconies to the east elevation between 8am and 9pm.

564. Overall, Officers consider there would be no materially harmful overlooking from the terraces or balconies to nearby residential properties with the planting in place and with hours of use of the terrace heavily limited.
565. Subject to conditions it is considered that the proposal would comply with residential amenity related policies: Local Plan policy DM21.3 and CS5 and draft City Plan 2040 policy HS3 and S23.

Sustainability

Circular Economy

566. 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.
567. In considering the circular economy aspects of the proposed development, it is noteworthy to mention that the demolition of the existing 11 storey building is being undertaken pursuant to the consent for the permitted 2020 scheme and as such is not included in the current planning application. As the demolition associated with this consent has commenced, the application does not include considerations as to opportunities to retain and refurbish the building. This is accepted.
568. Additional demolition proposed in the current application relates to the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street. These additional changes seek to act as an improvement to the approved scheme through enhancing the accessibility, permeability and quality of the public realm surrounding the site. Optioneering has not been undertaken in relation to this scheme and Officers are satisfied with this approach in the context of the lawfully implemented scheme.

569. The submitted Circular Economy Statement for the planning application describes the strategic approach to incorporating circularity principles and actions into the proposed new development, in accordance with the GLA Circular Economy Guidance.
570. The circular economy strategy includes details to support the reuse of existing materials, in addition to identifying an efficient materials strategy for all new elements, to include:
- The incorporation and use of existing paving slabs, and the retention of the ground floor slab at the existing Class E unit
 - Maximising the use of recycled and/or secondary content where feasible, including high levels of GBBS and recycled steel for the structural elements
 - Maximising opportunities for the re-use of recycled content in other materials such as the pre-cast concrete cladding, the plasterboard for walls and partitions, and interior floor finishes
 - Retention of existing piling where possible
 - A fully flexible open plan internal layout and easily accessible building services to accommodate a variety of end uses and internal configurations
 - A façade comprised of timber and natural stone panels in the form of modules which can all be independently disassembled from the envelope and replaced
571. 7.8% of the sub-structure (by mass), 0% of the superstructure (by mass), and 0% of the façade (by sq.m) would be retained. A pre-demolition audit has been undertaken identifying the types and quantities of key materials present in the pre-existing building whilst exploring onsite and off-site opportunities for reuse and recycling. This includes confirmation of a commitment to achieving key GLA targets including the reuse and recycling of 95% of non-contaminated construction and demolition waste.
572. Confirmation of the proposed measures and identified opportunities through an update to the Circular Economy Statement and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved are required by condition.

Operational energy strategy and carbon emissions

573. The Energy Statement accompanying the planning application demonstrates that the proposed development has been designed to achieve a site-wide overall 16% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building.
574. Energy demand and the risk of overheating would be reduced by including the following design measures:
- Effective external shading in form of external planters and columns, balconies and deep recessing of the glazing to reduce peak solar gain whilst maximising natural daylight
 - Addition of PVs to the southern façade of floors 15-18 to minimise solar gain and provide further external shading

- Provision of openable windows providing natural ventilation enabling a mixed mode strategy and night-time cooling
- Underfloor Air Distribution (UFAD) system for office areas allowing for improved thermal comfort
- Enhanced building fabric performance, including a high-performance curtain wall system with a low solar thermal transmittance, reducing space heating demand whilst limiting solar gain
- Energy efficient lighting and controls to minimise the internal gains and consequently the cooling loads

575. There is currently an available district heating network located in close proximity to the site which is proposed to be extended in 2027. There would be capacity to connect to the network once the building has been completed and is operational. Space provision has been identified within the basement level of the development to allow for future plant development to connect to the network in the future. This includes space for heat exchangers, isolation valves and safeguarded pipe routes to the site boundary. However, as the required information to determine the associated carbon emissions of the proposed development once connected to the network has not yet been made available, and to allow for flexibility in the event of any delays to the network becoming operational, the energy strategy relies on an independent servicing strategy and will be updated as further information becomes available.

576. Low and renewable energy technologies are proposed to the development including a PV array covering an area of 288sq.m (comprised of 168sq.m on the southern façade and 120sq.m on the roof) which would provide low carbon and renewable energy, and 2no. air source heat pumps (that are water based rather than refrigerant based to allow future connection to Citigen) located at roof level to provide space heating, domestic hot water, and cooling. The ventilation strategy is also decentralised with air handling units (AHU) on each floor to allow for multi-tenanted floors.

Energy Use Intensity (EUI)

577. 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 (whole) development is 141.8 kWh/m²/year inclusive of a space heating demand of 3.97 kWh/m²/year.

578. For comparative purposes, figures for the office and flexible commercial uses have also been separated and show that the office space would have an EUI of 135.6kWh/m²(GIA)/year and a space heating demand of 3.80 kWh/m²(GIA)/year, whilst the community space would have an EUI of 304.7kWh/m²(GIA)/year and a space heating demand of EUI of

16.5kWh/m²(GIA)/year These values are based on speculative allowances that would be reviewed in more detail to provide more accurate estimations in the next stages.

579. The site-wide energy strategy does not meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme. However, the calculated 16% reduction is broadly in line with other City office developments approved since the adoption of Part L 2021 that now includes low carbon heating for non-residential developments in the baseline, but not for residential developments. This 16% reduction is comprised of 12% savings from energy demand reduction and 4% savings from renewable energy.
580. A S106 obligation is to be included requiring reconfirmation of this energy strategy approach at completion stage and a Carbon Offsetting Contribution may be sought to account for any shortfall against London Plan targets, for the completed building. There would also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

581. Two BREEAM New Construction 2018 pre-assessments have been undertaken, one each for the office and retail uses targeting "outstanding" and "excellent" ratings respectively:
- a) Offices (shell and core): 90.64%
 - b) Retail (shell only): 83.10%
582. The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution and Materials, as well as the climate resilience credit in the Waste category.
583. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2040 Policy DE1. Post construction BREEAM assessments are required by condition.

Whole Life Cycle Carbon Emissions

584. As outlined throughout this report, the pre-existing 11-storey Tenter House building is being demolished under the lawfully implemented 2020 consent, reference 17/01050/FULMAJ. Concern has been raised through public consultation that the application does not take into account the demolition of the 11-storey building with regards embodied carbon emissions.
585. The City of London Carbon Options Guidance Planning Advice Note (2023) states that proposals that are either (a) major planning applications or (b) are minor applications that propose to demolish the majority of the building should

undertake an optioneering exercise at pre-application stage, to explore options for refurbishment or redevelopment of the site prior to adding other planning considerations into the mix. This optioneering process is then independently reviewed on behalf of CoL to provide robustness to the process.

586. As the vast majority of the structures on site are being demolished already under the lawfully implemented consent, Officers did not consider it reasonable to require optioneering for the remaining elements to be demolished under this application - that is the Class E 'Pret a Manger' and its remaining structures, the car park access ramp, and plaza - as there was no feasible or reasonable option for retention and refurbishment of these elements when the primary building structure is already being demolished.
587. London Plan Policy SI2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the circular economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the whole life-cycle carbon emissions of the building. The whole life-cycle carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.
588. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table below.
589. The following principal carbon reduction measures have been incorporated into the proposal, to reduce the amount of embodied carbon resulting from the proposed scheme:
- For the superstructure, composite timber joists with precast planks and in situ concrete topping would be chosen due to its low embodied carbon when compared with other options
 - The façade system comprises a precast concrete unitised system with punched composite timber curtain walling to promote reduced onsite material usage and waste
 - The use of an underfloor air distributing system (UFAD) which would reduce the quantity of ductwork and piping required
 - Internal partitions have not been included into the base build and internal finishes have been limited to reduce waste from individual tenant alterations.

590. The tables below show whole life-cycle carbon emissions per square meter in relation to the GLA benchmarks (embodied carbon without carbonisation applied) at planning application stage:

| Scope | Proposed Redevelopment | Benchmark | GLA Benchmark |
|---|------------------------|-----------|------------------|
| RICS components | KgCO2/m2 | KgCO2/m2 | |
| A1-A5 (excluding sequestered carbon) | 750 | <950 | GLA Standard |
| | | <600 | GLA Aspirational |
| A-C (excluding B6-B7; including sequestered carbon) | 1185 | <1400 | GLA Standard |
| | | <970 | GLA Aspirational |
| B6-B7 | 1161 | N/A | N/A |

591. The results show that the A1 – A5 and A-C (excluding B6 - B7) whole life-cycle emissions would meet the GLA benchmarks.

592. These figures would result in overall whole life-cycle carbon emissions of 80,192,147 kgCO₂e over a 60-year period. Of this figure, the operational carbon emissions would account for 39,685,302 kgCO₂e (49.5% of the building's whole-life life cycle), and the embodied carbon emissions for 40,506,845 kgCO₂e (50.5% of the building's whole life-cycle carbon). The embodied carbon from the substructure contributes 16.8% to the total embodied carbon, while the superstructure accounts for 41.2% of the total. Building services (excluding modules B6 and B7) would contribute 27.6% of total embodied carbon emissions, and finishes and external works would contribute to 14.3% of the total embodied carbon figure.

593. The majority of the operational carbon emission figures resulting from the scheme relate to assumed tenant energy consumption, a large proportion of which is attributed to servers and equipment. A circumspect approach has been used which assumes high levels of tenant energy consumption in consideration of the range of tenant types that might occupy the commercial and community space. When taking into account the base build independently, the scheme has the potential to achieve a minimum NABERS 5* equivalent level of performance subject to detailed monitoring of the full HVAC system.

594. A higher recycled content of steel and cement replacements in concrete would be targeted in the detailed design and procurement stages which would further reduce the upfront carbon emissions. An appraisal has been undertaken to identify potential opportunities to reduce embodied carbon and move towards reaching the GLA aspirational targets based on the most contributing baseline materials. These opportunities include:

- Utilising 50% to 70% cement replacement for the substructure concrete

- Low carbon alternative (Electric Arc Furnace) for sub and superstructure reinforcement steel
- Low carbon alternative for extruded aluminium profiles for the façade, using renewable energy and high recycled content
- Decreased thickness of façade glazing
- Reused panels (RMF EcoRange) for raised access flooring panels

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

Climate Resilience

Urban Greening

596. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of the design and site. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Draft City Plan 2040 policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context.

597. The proposed development would incorporate significant public realm areas and landscaping at street level and higher up the building in the form of new green terrace at the 14th floor, accessible balconies on the east elevation, and additional greened inaccessible area on the north and west elevation as part of the exoskeleton design.

598. The landscape proposals seek to create a robust green infrastructure embedded within the architecture. This includes an extensive green roof located at level 20, planted balconies on seven levels to create a cascading green façade in addition to the 14th floor terrace which would comprise lush planting and mature trees in an informal arrangement that encourages active enjoyment of the garden. The planting strategy includes a mix of species interspersed across the site in addition to the incorporation of varied tree species which seeks to improve biodiversity.

599. Three different calculations of the Urban Greening Factor have been undertaken. Scenario A relates to the proposed building excluding the plaza, Scenario B includes both the proposed building and plaza but excluding the soft landscaping in the plaza, and Scenario C includes the proposed building and plaza excluding soft landscaping but including climbers added at the uppermost storeys of the building as a result of the design amendments.

600. Scenario A would achieve a minimum Urban Greening Factor (UGF) of 0.56 whilst Scenario B and C would each achieve a minimum UGF of 0.32, therefore demonstrating compliance with the London Plan requirement for all scenarios.

Biodiversity

601. As the existing site is a zero-baseline site (i.e. has no vegetative habitats over the minimum mappable unit), it is acknowledged that the 10% BNG requirement is not mandatory. Nevertheless, the BNG Metric has been applied as a demonstration tool to calculate the biodiversity units generated by the proposed landscaping, with a target of a minimum of 3 BU/ha.
602. The proposed development would result in a total of 4.19 BU/ha which would exceed the 3 BU/ha proposed target included with the City of London's Draft Local Plan (City Plan 2040).
603. Other enhancement measures such as provision of bat and bird boxes are recommended and would be considered an ecological enhancement, however, wouldn't affect the calculated net gain scores under the DEFRA Metric Biodiversity 4.0 methodology.

Overheating

604. To address urban heat island risks, the proposed development includes an approach designed around passive measures and limiting internal heat gains to minimise the need for cooling. This includes the incorporation of several features including the use of high albedo materials, openable windows, exposed internal mass and high ceilings, and the provision of green infrastructure on the roof.

Flooding

605. The site is located within Flood Zone 1 - land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (< 0.1%). A large portion of the roof would be provided as a green / blue roof, which would capture surface water at source and reduce the peak runoff from the development. It is proposed to attenuate surface water collected within the building footprint to greenfield run-off rate (2.59 litres/sec). An attenuation tank of 80m³ is proposed within the basement to achieve the permissible discharge rate.

Water Stress

606. Efficient water consumption would be maximised through the incorporation of water efficient sanitaryware and the project would target the 55% improvement over the BRE's baseline building, corresponding to all the credits being achieved under BREEAM Wat 01. Rainwater harvesting is proposed using the proposed attenuation tank within the basement. Greywater harvesting is proposed for the showers and wash hand basins where feasible. Water metering infrastructure would be provided to ensure in use monitoring and preventing minor leaks.

Sustainability conclusion

607. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process

relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.

608. The proposed development would deliver a high quality, energy efficient development that is on track to achieve “outstanding” and “excellent” BREEAM assessment ratings across its uses, in overall compliance with London Plan policy SI 2, Local Plan policy CS15 and DM 15.5 as well as Draft City Plan 2040 policy DE1. The proposals cannot meet the London Plan policy SI2 target of 35% operational carbon emission savings compared to a Part L 2021 compliant scheme which the GLA acknowledges will initially be difficult to achieve for commercial schemes. However, the scheme demonstrates the implementation of various measures to reduce operational energy demand and benefits from future capacity to connect to a nearby district heating network upon completion. It is expected that further reductions in operational energy demand will occur over time in accordance with the anticipated decarbonisation of the heat network.
609. The planning stage whole life-cycle carbon emissions accords with the GLA benchmarks, and opportunities to maximise the reuse of deconstruction materials from the site have been identified to mitigate impacts of redevelopment. The proposal therefore would satisfy the GLA’s circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and Draft City Plan 2040 policy CE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and various opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Page 97 Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and Draft City Plan 2040 polices S14, OS1, OS2, OS3, S15, CR1, CR3.

Security

610. London Plan Policy D11 (‘Safety, security and resilience to emergency’) states that development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
611. Local Plan Policy CS3 (‘Security and Safety’) seeks to ensure that the City is secure from crime, disorder, and terrorism. Local Plan Policy DM3.2 (‘Security measures in new developments and around existing buildings’) seeks to ensure

that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 ('Crowded places') requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.

612. Safety and security of a development is enhanced where there is adaptability within the space to manage changes in security needs. During the operational phase, areas within the public realm would be well-lit, with active frontages providing passive surveillance, in addition to the presence of building management personnel.
613. Security proposals to protect the building, its users, and new areas of public realm have been developed in consultation with the City of London Police. Where 'terrorism' has been identified to be a potential direct or indirect threat to the development, appropriate improvements to vehicle management, structural design, façade glazing systems, Hostile Vehicle Mitigation (HVM) strategies and lockdown incident management strategies would be applied as required. The proposals use a mix of physical interventions such as planters, landscaping, and bollards, and technological means such as the use of video surveillance systems (VSS), and access control measures, incorporated into the design of the built form alongside operational security measures to promote a safe and secure sense of wellbeing for users operating within, and reduce potential opportunities for crime and anti-social behaviour occurring around the site.
614. The proposed security measures are designed to limit access to areas beyond the public realm through the use of certified intrusion resistant doors and window schemes and building access controls with anti-tailgating features. The design of the public realm in City Point Plaza incorporates spatial features through landscaping and a reduction in areas of concealments and dead spaces, thereby improving natural surveillance across the site and reducing the overall potential of antisocial activity.
615. In addition, the potential of any vehicular impact upon the structure has also been considered. Hostile Vehicle Mitigation (HVM) has been sensitively incorporated in the public realm, through sensitive use of a mix of "softer" measures such as a HVM compliant planters including dense landscaping and tree planting, with a limited number of bollards, with none to be placed on the public highway.
616. The proposed servicing strategy would separate vehicle servicing access from areas of high pedestrian footfall or dwell spaces as far as possible, allowing the public realm to perform a variety of functions without being disturbed by the presence of large vehicles. The proposals have been assessed to ensure they

are serviced, maintained and managed in such a way that would preserve safety and quality, without disturbance or inconvenience of the surrounding public realm, in accordance with London Plan (2021) Policies D3 (4) and D9.

617. Safety and security of a development is enhanced where there is a clear understanding of what space is to be used for, and where a sense of ownership is fostered. The development has been designed to be welcoming to both visitors and legitimate, authorised users, through active signposting, and clear demarcation of circulation across the public realm along New Union Street, Moorfields, City Point Plaza, and Moor Lane. They have been designed to be inclusive and have access features such as gentle gradients, suitable surfaces, rest points and good lighting.
618. The overall final security strategy, including further details of HVM measures which would be secured by condition, and a Public Realm Management Plan to be secured by condition, would detail more specifically the measures to protect the building and its different user groups. The proposal, subject to conditions would be in accordance with Local Plan Policies DM3.2 and DM3.3. The proposals are considered to be in accordance with City of London Local Plan (2015) Policy CS3.

Suicide Prevention

619. Policy DM 3.2 of the adopted Local Plan 2015 ('Security measures in new developments and around existing buildings') aims to ensure that appropriate security measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm. Policy DE5 of the draft submission City Plan 2040 advises that appropriate safety measures should be included in high rise buildings, to prevent people from jumping or falling. The City Corporation has also approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near the edges of balconies and terraces, as well as erecting balustrades. The guidance explains that a risk assessment should be carried out to identify building features which could be used for suicide, notably any point located 10 metres above ground level. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrent capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.

620. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building Regulation K2 states the following:
K2 – (A) Any stairs, ramps, floors and balconies and any roof to which people have access, and
(B) any lightwell, basement area or similar sunken area connected to a building, shall be provided with barriers where it is necessary to protect people in or about a building from falling.
621. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS 6180: Barriers in and around buildings.
622. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advises a barrier height of at least 2.5 metres high, no toe or foot holds, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with Building Regulation standards and, where feasible and practical, consider providing a barrier in line with UKHSA guidance. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to adverse weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.
623. The proposed development comprises a tall building which includes balconies for the use of the building occupants from floors 1 to 13 to the east elevation, a larger wraparound terrace at the 14th floor, and a linear terrace to the south elevation at level 19 that may represent a potential risk to individuals attempting suicide from the building. These risk areas have been defined and assessed in consultation with City of London as part of the pre-application consultation process, and solutions have been agreed and applied to the areas identified.
624. The balconies and terraces would operate with restricted access to tenants only. The balustrades on all balconies from level 1 to 13, and 19 are at a height of

1.4m. The 14th floor roof terrace is surrounded by a 2.5m high screen along with low-growing dense planting to restrict access to the edge of the building. The balconies are arranged to be directly overlooked by the adjacent internal workspace, providing direct human surveillance to these areas. Further measures include suitable lighting and CCTV provision to further augment the opportunities for human intervention.

625. The applicant agrees to provide a Suicide Prevention Strategy and Management Plan for tenants that aim to reduce the risk of suicide. The Management Plan would include the following details: (i) Signposting to appropriate support services for those who intervene/witness a suicide or discover a body, (ii) Collect data to audit and mitigate risk factors, (iii) Conduct regular reviews of the suicide risk assessment and monitor performance, (iv) Implementation of suicide mitigation measures including adequate information, (v) training, and record keeping and maintenance, (vi) Support employee welfare including an Employee Assistance Programme. This would be secured by condition along with details of balustrade height and design.

626. A combination of physical barriers, staff training, and surveillance are proposed to maximise the effectiveness of preventative measures, including measures that increase the potential for human intervention. In all instances the height of the proposed barriers and other measures are adequate, balustrades would exceed the minimum required by Building Regulations and seek to provide heights in line with the Suicide Prevention PAN, and as such would comply with the relevant development plan policies notably DM3.2. of the Local Plan (2015) and policies DE2 and DE4 of the draft City Plan 2040.

Fire Statement

627. A Fire statement has been submitted outlining the fire safety strategy for the building. The City District Surveyor's office has reviewed the submitted fire statement and has confirmed that this 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.

Assessment of Public Benefits and the NPPF Paragraph 208 Balancing Exercise

628. Under s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special regard must be had to the desirability of preserving the settings of the aforementioned listed buildings.

629. When considering the impact of a proposal on the significance of designated heritage assets, decision makers are required to give great weight to their

conservation (and the more important the asset, the greater the weight should be), and to be satisfied that any harm is clearly and convincingly justified (NPPF paras 205 and 206).

630. The proposal would result in a slight, minor level of less than substantial harm via indirect setting impacts to the significance of St Paul's Cathedral.
631. Given the proposal would result in harm to the significance of a Grade I listed building, there is a strong presumption against the grant of planning permission. Notwithstanding, that presumption is capable of being outweighed via wider public benefits.
632. The proposal would trigger paragraph 208 of the NPPF, which 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'.
633. Public benefits could be anything that delivers economic, social or environmental objectives as described in the NPPF (para 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public to be genuine public benefits.
634. The key economic, environmental, and social public benefits which flow from the proposal are considered to be:
635. Economic:
- The provision of 33,758 sq.m (GIA) of grade A office floorspace, would contribute to office floorspace requirements for the City delivering an estimated net increase of 374 FTE employees over the consented scheme (1447 to 1821 (or a net increase of 467 without the 20% absentee rate (1809 to 2276)). This uplift would contribute significantly to inward investment in the Square Mile and supports the strategic objective to maintaining a world class city which is competitive and promotes opportunity.
 - The provision of 287sq.m (GIA) of retail floorspace to activate and animate the ground floor plane of the site, which would increase spend in the City by workers, residents, and visitors.
 - The enhanced public realm would drive footfall through the site during the day, evenings, and weekends. Occupiers on site and in the locale would benefit from the increase in footfall and the high-quality amenities provided by the proposed development.

Collectively, these benefits are attributed moderate weight.

636. Environmental:

- It would deliver growth in a highly sustainable location which would assist in the delivery of the City of London's Transport Strategy, assisting in creating sustainable patterns of transport.
- At a local level the proposal would result in significant enhancement of the public realm at ground level including the revitalisation of New Union Street and substantial enhancements to City Point Plaza including increasing the size and quality of the public open space with an additional 30.3sq.m of permissive path and an additional 124.5sq.m of Open Space.
- The proposals would deliver enhanced permeable public space, active uses which would enhance urban greening, and the quality, appearance, and distinctiveness of the which aligns with the aspirations of Destination City.
- The significant increase and extent of urban greening on the building and in the enhanced public spaces would provide a healthy, sustainable, and biodiverse environment for all to access. The urban greening is exemplary and the UGF score of 0.56 for the building excluding the plaza would meet/exceed emerging City Plan Policy targets.
- There would be enhancements to biodiversity from the proposed landscaping, over and above the biodiversity targets set out in draft policy.
- Reduction in vehicle trips through consolidated servicing strategy and removal of the car park, and associated public highway improvements through the removal of vehicle crossovers.
- The local area would be transformed through improvements to the public realm for pedestrians along New Union Street and City Point Plaza, as well as the potential for enhanced pedestrian and cyclist movement around the site and locality through pavement widening, changes to the road layout and function along Moorfields and streetscape enhancements, which would encourage active travel and support the wellbeing of users and improve highway safety constituting a key social and environmental benefit in a congested and polluted area. The highway improvement works are to be delivered through a s278 agreement.

Collectively, these benefits are attributed significant weight.

637. Social:

- The provision of circa 142sq.m (GIA) of community floorspace at ground floor level to encourage socialisation, combined with the café/restaurant unit at ground floor and public realm enhancements to promote wellbeing and support vibrancy.
- Improvements to accessibility and wayfinding through City Point Plaza through the removal of the car park access ramp and improvements to level

access across the plaza which would establish a more equitable and pleasant route from Moorgate Station to the Site and beyond.

- The delivery of cultural proposals unique to the Site to further enhance the environment and public realm around the site, including a commitment to providing Creative Workspace to promote diversity of commercial occupiers and to contribute to the aims of Destination City.
- The quality and extent of the public realm would support the social vibrancy of the area through encouraging activity on evenings and weekends. The site would attract visitors, increase tourism, support and enhance the image of the area.
- The proposal would secure a S106 obligation of £1,582,300 towards affordable housing provision.

Collectively, these benefits are attributed moderate weight.

638. In relation to the indirect impact on the Grade I listed St Paul's Cathedral, this is a designated heritage asset of the highest order and the highest sensitivity. When carrying out the balancing exercise, considerable importance and weight has been given to the desirability of preserving its setting and great weight given to its conservation.

639. Officers consider that the slight level of harm arises, in this case, from the fleeting loss of clear sky behind part of the Cathedral's west front, in a viewing experience characterised by modern buildings passing in and out of the Cathedral's backdrop silhouette; this experience of the Cathedral is not one of a pristine, strictly formal viewing sequence, but a more casual, kinetic one, in which the modern city is seen continually and organically evolving behind the Cathedral, which in some cases involves buildings making contact with its silhouette. The proposal is consistent with this experience and would be very minimally visible.

640. As set out in preceding paragraphs, options have been explored to optimise the benefits which could flow from the proposal whilst avoiding or minimising harmful impacts to heritage assets. In this case, the slight level of harm arises more because of the very high sensitivity of the Cathedral, rather than because of the magnitude or character of the proposal's impact. This being so, officers consider it appropriate, in this instance, to weigh this impact against the public benefits of the proposal.

641. When carrying out the paragraph 208 balancing exercise in a case where there is harm to the significance of designated heritage assets, considerable importance and weight should be given to the desirability of preserving the building or its setting. In this case, it is the view of officers that the collective package of the public benefits secured, and which flow from the development proposals, would outweigh the slight, very minor level of heritage harm identified

to this designated heritage asset of the highest calibre, thus complying with para 208 of the NPPF.

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

642. In consideration of the proposed development, the Public Sector Equality Duty (PSED) requires the City of London to consider how the determination of the application would affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.
643. 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.
644. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.
645. As set out in the submitted Statement of Community Involvement (SCI), the consultation process meetings and consultation with stakeholders from resident groups, cultural institutions, and community organisations which in particular sought to develop the Culture Plan. This feedback formed principles to underpin the development's cultural offer, which would carry forward the commitment to genuine involvement with local stakeholders through co-curation and shared programming with community and cultural partners.
646. It is the view of officers that a decision to grant permission would remove or minimise disadvantages suffered by persons who suffer from a disability including mobility impairment. In particular, the physical design and layout of the scheme has been designed to be accessible to all regardless of age, disability, whether you are pregnant, race, sex, sexual orientation and gender reassignment and marital status. This would be achieved through measures such as the creation of step-free access to all parts of the site, the provision of resting/seating areas in the external landscape and public space. Where feasible this has been located

at intervals no greater than 50m and at least one additional disabled parking bay would be provided within the public realm as part of S278 works. Final details would be secured by condition in order to ensure equality of access. For example, furniture provisions such as cycle stands, bollards and seating areas are indicative and subject to future design detail and development.

647. It is recognised that noise and disturbance during construction may have a disproportionate impact on certain groups. These points have been considered in the Transport and Accessibility sections of the report and conditions are recommended to mitigate the impacts so far as possible.
648. It is noted that the Equality Act carries ongoing responsibilities which will continue once the development is complete. As part of considering the design of the building and the physical environment, the property management team for the building and public spaces will need to have suitable management policies and procedures to ensure the obligations of the Act are met once the building is in operation. This would include the proposed community space which currently does not have any end user finalised. In formulating the community and cultural offers, the landowner should continue to engage with a full range of local stakeholders so that its offer is relevant and accessible to all.

Human Rights Act 1998

649. 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”)).
650. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby residential properties including by reason of loss of light or privacy. 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. 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 and contributing to the City’s primary business and professional services function, outweighs the Minor 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.

651. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising though impact on daylight and sunlight or other impact on adjoining properties, it is also the view of officers that such interference is in the public interest and proportionate and strikes a balance between the competing interest of the land owners and community as a whole.

CIL, Planning Obligations and related Agreements

652. 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.

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

654. 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. The Mayor now collects funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

655. Under Regulation 74B of the CIL Regulations 2010 (as amended) "the Regulations", CIL payments made in respect of a development that has commenced but has not been completed can be credited against the levy liability for a revised scheme under a new planning permission, on all or part of the same land. This levy credit is known as abatement. This provision is to ensure that CIL is not inappropriately levied twice (or more) as schemes change during the course of development of a site.

656. Planning permission 17/01050/FULMAJ resulted in a total CIL levy of £3,970,976.25 which has been paid in full (£1,427,745.19 collected for the City of London and £2,543,231.06 collected for MCIL2).

657. The applicant may therefore be eligible to submit a request for abatement in accordance with Regulation 74B of the Regulations. If abatement were to be granted, this would allow for the CIL levy of £3,970,976.25 paid in respect of 17/01050/FULMAJ to be credited against the CIL due in respect of this application. However, this is conditional on this application receiving planning permission from the City of London, the correct CIL procedure being followed in accordance with the Regulations, including a valid request for abatement being received.

658. Regulation 74B of the Regulations also allows for demolition 'credit' from an original planning permission on a site to be carried forward to an alternative development on the same land under a new planning permission, provided that abatement is granted in relation to the new development. However, in order for this demolition 'credit' to be claimable the request for abatement must be made within three years of the date of grant of the original planning permission under which the buildings were demolished. Planning permission granted under reference 17/01050/FULMAJ received consent 29 September 2020, and therefore the three-year time period has now passed. As a result, the demolished floorspace credited in the calculation of CIL for 17/01050/FULMAJ is not to be credited in the calculation of CIL for this application.

659. For the avoidance of doubt, as the planning permission does not expressly provide for the development to be carried out in phases, payment of the CIL levy is not to be phased. The development, if granted, would be treated as one chargeable development and payment of CIL would be required upon commencement of the development in accordance with the Regulations as well as the City of London CIL Charging Schedule (2014) and MCIL2 Charging Schedule (2019).

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

MCIL2

| Liability in accordance with the Mayor of London's policies | Contribution (excl. indexation) | Forwarded to the Mayor | City's charge for administration and monitoring |
|---|---------------------------------|------------------------|---|
| MCIL2 payable | £5,835,395 | £5,601,979 | £233,416 |

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 | £2,373,450 | £2,254,778 | £118,673 |
| City Planning Obligations | | | |
| Affordable Housing | £1,582,300 | £1,566,477 | £15,823 |
| Local, Training, Skills and Job Brokerage | £949,380 | £939,886 | £9,494 |
| Carbon Offsetting Contribution (as designed) <i>Not indexed</i> | £265,172 | £265,172 | £0 |

| | | | |
|--|----------------------|----------------------|--------------------|
| S106 Monitoring Charge | £4,500 | £0 | £4,500 |
| Section 278 (Evaluation and Design Fee) <i>Not indexed</i> (see paragraph 663 below) | £75,000 | £75,000 | £0 |
| Total liability in accordance with the City of London's policies | £5,249,802.00 | £5,101,312.70 | £148,489.30 |

Planning Obligations and related Agreements

661. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations (*Highways Schedule of Condition Survey, site access, consents, licences etc*)
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage (*Demolition and Construction*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Travel Plan (including Cycling Promotion)
- Construction Monitoring Cost (*£53,820 First Year of development and £46,460 for subsequent years*)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Section 278 Agreement (*CoL*)
- Television Interference Survey
- Wind Audit
- Solar Glare
- Cultural Implementation Strategy
- Creative Workspace (*Provision of and the submission of a Management Plan*)
- Community Space (*Provision of and the submission of a Management Plan*)
- Delivery of Open Space Improvements and provision of permissive path
- Removal of existing car park ramp

662. The Open Space at CityPoint Plaza is regulated by 1962 Deed requiring its provision and maintenance as open space and prohibiting alterations to its layout or installation of structures without the City's previous consent. Reconfigurations were agreed in 1999 and 2017, reflected in the current layout. The proposed Open Space changes would require further consents from the City under the 1962 Deed. It is proposed that these be agreed in conjunction with the S.106 Agreement. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed agreements and enter into the S278 agreement.

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

- Repaving of footways and re-alignment of road to suit new site layout on Moorfields and Moor Lane.
- Resurfacing of the carriageway on Moorfields
- Removal of existing crossover and reinstatement of footway, following the removal existing ramp to basement
- Provision of road markings
- Provision of at least one on-street disabled bays with electric charging points and associated traffic orders
- Removal of redundant street furniture, if applicable
- Any highways repair and reinstatement works in the vicinity of the site, as impacted by construction works; and
- Any other works reasonably necessary to make the Development acceptable.

664. A S278 evaluation and design fee of £75,000 was secured under the S106 agreement relating to the extant planning permission, 17/01050/FULMAJ and this fee has been paid in full to the City Corporation. As the S278 evaluation and design process has not been undertaken in relation to the extant scheme, the £75,000 already paid shall be used towards the design of the highway works in line with which planning permission the applicant implements. A S106 agreement would therefore credit the fee as already paid.

Monitoring and Administrative Costs

665. 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.

666. 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.

Conclusions and Overall Planning Balance

667. 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.
668. 101 objections to the scheme have been received raising concern over loss of amenity to residents from overlooking and loss of light, harm to heritage assets, and the impact of the proposed delivery and servicing arrangements on local residents as the primary points. The Surveyor to the Fabric of St Paul's, the Barbican and Golden Lane Neighbourhood Forum, Barbican Quarter Action and the Barbican Association are some of those that raise objections to the scheme. Historic England has provided comment but has not formally objected to the proposals.
669. The proposals would deliver 33,758 sqm (GIA) of high-quality flexible office space that would contribute towards maintaining the City's position as the world's leading international financial and business centre.
670. The proposals are classed as a tall building under policy, and the site is not located within an area identified as inappropriate for a tall building in the City's Local Plan. Officers have thoroughly assessed the qualitative impact of the proposals, and find while most parts of London Plan D9 are complied with some conflict with London Plan D9 C (1:a:i) arises due to adverse impacts on designated heritage assets and views, for the same reasons creating conflict with draft City Plan 2040 S12 (2,8:a&c,10:b) and S13:2. These impacts and conflicts are considered below.
671. The proposals would have a transformational impact on the vibrancy, activation and permeability of the streetscene, providing a high-quality scheme which, over and above the consented proposals, provides a responsive design that capitalises on the important gateway location. In particular, the use of the entirety of the Moorfields ground floor frontage with an active public offer and provision of sheltered routes along its extent, carrying on through to the plaza and new plaza facing community hub, are found to rehabilitate what is presently experienced as a back-land location. A pleasing calm and ordered façade has prioritised a welcoming and inclusive character, making use of natural materials such as timber soffits and window panels, and supports to achieve a harmonious design which draws together the plaza surroundings, responding to both its post-war and contemporary contexts.
672. In this way the proposals are seen as an improvement on the consented scheme which is more corporate and isolated in its architectural approach. Importantly,

the designs have been upgraded to meet the rigorous assessments against inclusivity and accessibility under the draft City Plan 2040, offering a much-improved ground floor, internal layout and wayfinding experience. The proposal amounts to a complex and high-quality piece of design in response to local and pan-London contexts. It is considered the proposal would optimise the use of land, delivering high quality office space, offering a greater diversity and more active streetscape when compared to the consented scheme.

673. The proposals substantively improve the public realm through the releveling of the plaza and expanding the extent of its continuous accessible surface. This is a significant enhancement to the civic quality of the plaza, an important public open space. The removal of the vehicle access ramp on entry to the plaza from Moorfields would create a welcoming point of transition and improve wayfinding along on this key east-west route through the city. Moreover, the proposed landscaping and greening of the facades provide a moment of relief in the surroundings. Improvements to New Union Street reflect the prioritisation of pedestrian movement, as well as opportunities for public art, and provide an improvement in the activation at street level, which is continued around the site as a whole.
674. The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight sunlight, microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant. The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings in Willoughby House. However, considering BRE Guidance, the nature of the results and the sites location within a dense urban environment and that it is the balconies on the residential properties that contributes most to the losses of light rather than the proposed building, it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not reduce the daylight to nearby dwellings to unacceptable levels such that it would warrant a refusal of permission.
675. Subject to stringent controls details of which would need to be set out in a delivery and servicing management plan, it is considered that the proposed servicing arrangement would be acceptable.
676. It is considered that the proposal would deliver a low carbon and energy efficient development of the highest sustainability quality that is on track to achieve a minimum 'excellent' BREEAM assessment rating for the office use, whilst aspiring to BREEAM 'outstanding', in accordance with Local Plan and London Plan requirements.

677. The proposals would preserve the significance and contribution of setting of a broad range of heritage assets. With regards to objections from residents, while the proposals would create a visible change in the surroundings of the Grade II Listed Barbican Estate, officers consider this change to preserve the existing character of views from the Estate looking east, which currently take in a number of large contemporary developments along Moorfields. The proposals would preserve the significance and contribution of setting of all heritage assets except that of St Paul's Cathedral, which would experience a minor level of less than substantial harm through the slight erosion of its clear sky setting in the views from the Southbank. The proposed development has been amended to mitigate this visual intrusion as far as possible through a drop in height, the rearrangement of plant screening and addition of greening. Nevertheless, the proposal would result in a slight degree of conflict with Local Plan Policies CS12 (1), DM12.1 (1), CS13 (2) and draft City Plan 2040 policies S11 (2), HE1 (1), S12 (8 &10), S13(2) and London Plan Policy HC1 (C), and with the objective set out in Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
678. 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 whole plan the proposal does or does not accord with it.
679. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals make will make a significant contribution to advancing the strategic business objectives of the City and comply with relevant design, inclusive access, biodiversity, urban greening, sustainability and public realm policies that notwithstanding the policy conflicts identified above, the proposals comply with the development plan when considered as a whole.
680. 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.
681. The proposal would result in a slight, very minor level of less than substantial harm by slightly reducing the extent to which the Cathedral is seen against clear sky in the kinetic experience from the South Bank. St Pauls Cathedral is an iconic building of international importance and its historic, architectural and evidential values are of the uppermost significance and therefore great weight must be attached to this significance in evaluating any impacts. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given

to the desirability of preserving the setting of listed buildings, including when carrying out the paragraph 208 NPPF balancing exercise in relation to less than substantial harm to the significance of listed buildings. Further, 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.'

682. The key public benefits of the proposal are considered to be the animation and activation of the streetscene to Moorfields and dramatic improvement to the public realm which would improve worker productivity and wellbeing and enhance the image of the area, translating to economic benefits. The significant enhancements to the public realm at ground level and increased urban greening at the upper levels, delivering enhanced public space, retail and active frontages, as well as overall improved sustainability measures for the site would contribute to both environmental and social benefits as per paragraph 8 of the NPPF.
683. The public realm proposals would be categorised as a public benefit with significant weight, noting the increase in level, fully accessible open space. It is considered that the wider public benefits above would be more than sufficient to outweigh the less than substantial heritage harm identified, thus complying with paragraph 208 of the NPPF.
684. Therefore, in addition of other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 208 NPPF balancing exercise above, and the significant weight to be placed on the need to support economic growth (paragraph 81), also indicate that planning permission should be granted. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Background Papers

Consultation Responses:

Support, Mr Michael Melnick, 23 April 2024
Neutral letter, Mr Jan-Marc Petroschka, 24 April 2024
Objection, M Berer, 26 April 2024, 8 May 2024 and 17 September 2024
Objection, Mr Tim Bishop, 1 May 2024
Objection, Mr Nigel Gilbert, 1 May 2024 and 2 October 2024
Objection, Ms Gabrielle Oliver, 1 May 2024 and 8 May 2024
Objection, Mrs Vivien Fowle, 1 May 2024
Objection, Ms Sheelagh McManus, 2 May 2024 and 28 September 2024
Objection, Dr Michael Swash, 2 May 2024, 8 May 2024, and 28 September 2024
Objection, Guillaume Faucompre, 2 May 2024 and 2 October 2024
Objection, Dr Lucy Pollard, 3 May 2024
Objection, Susan Gilbert, 5 May 2024 and 1 October 2024
Objection, Dr Barbara MG Corley, 5 May 2024
Objection, Helen Kay - Willoughby House Group, 5 May 2024 and 25 September 2024
Objection, Bernard Hughes, 6 May 2024 and 2 October 2024
Objection, James Y Watson, 6 May 2024
Objection, Mr Scott Palmer, 6 May 2024 and 26 September 2024
Objection, Nina Barber, 6 May 2024
Objection, Caroline Bennett, 6 May 2024, 7 May 2024, and 26 September 2024
Objection, Mr Benedict Harris, 6 May 2024
Objection, Ms Lila Rawlings, 6 May 2024 and 2 October 2024
Objection, Richard Haynes, 6 May 2024
Objection, Mr G Dissez, 6 May 2024
Objection, Mr Petre Reid, 6 May 2024 and 1 October 2024
Objection, Mark McMillan, 6 May 2024 and 2 October 2024
Objection, Sami Nkaili, 6 May 2024
Objection, E Hirst, 6 May 2024 and 1 October 2024
Objection, Valerie Mills, 7 May 2024
Objection, Ms Rashda Rana SC, 7 May 2024
Objection, Dr Steve Nicholson, 7 May 2024
Objection, Christopher Makin, 7 May 2024
Objection, Ian Williams, 7 May 2024 and 30 September 2024
Objection, Graham Webb, 7 May 2024
Objection, Mrs Katherine Jarrett, 7 May 2024 and 29 September 2024
Objection, Ms Patricia McGettigan, 7 May 2024
Objection, Mr Michael Friel, 7 May 2024 and 30 September 2024
Objection, Anonymous, 8 May 2024
Objection, Ms Hilary Sunman, 8 May 2024
Objection, Dr Dimitri Varsamis, 8 May 2024
Objection, Melissa Marks, 9 May 2024

Objection, Katherine Green, 9 May 2024
Objection, Richard and Ann Holmes, 9 May 2024
Objection, Philippa and David Andrews, 9 May 2024
Objection, Mr Nazar Sayigh, 9 May 2024
Objection, Mrs Charlotte E Bradford, 10 May 2024
Objection, Fiona Lean, 10 May 2024
Objection, Ms Scarlett Roux, 10 May 2024
Objection, Dr Paul Horsnell, 10 May 2024
Objection, Mr David Hall, 10 May 2024 and 2 October 2024
Objection, James Ball - Brandon Mews House Group, 10 May 2024
Objection, Gillian Castle Stewart, 10 May 2024
Objection, Anonymous, 10 May 2024
Objection, Mr Edward McEaney, 10 May 2024
Objection, Brenda Szlesinger, 13 May 2024
Objection, Colin Davis - The Heron, 5 Moor Lane Residents Committee, 14 May 2024 and 3 October 2024
Objection, Averil Baldwin - Barbican Quarter Action, 14 May 2024
Support, Mr Guy Orton, 17 September 2024
Objection, Dr NJ and Mrs SP Astbury, 27 September 2024
Objection, Christopher Shaw, 28 September 2024
Objection, Keith Webster, 30 September 2024
Objection, Ms Nicola Guereca, 30 September 2024
Objection, Mr John Holme, 30 September 2024
Objection, Sian Phillips, 30 September 2024
Objection, Ms Jo Bradman, 30 September 2024
Objection, Andrew Watts, 1 October 2024
Objection, Professor Tim Butler, 1 October 2024
Objection, Mr Louis Gilbert, 2 October 2024
Objection, Henrietta Wells, 2 October 2024
Objection, The Willoughby House Group RTA and The Brandon House Group RTA, 2 October 2024
Objection, Bruce Robertson, 2 October 2024
Objection, Lisa Shaw, 2 October 2024
Objection, Mr Alan Budgen, 2 October 2024
Objection, Poppi Haynes, 2 October 2024
Objection, Lucy Sisman, 2 October 2024
Objection, Richard Barrett, 2 October 2024
Objection, Felicity Guinness, 3 October 2024
Objection, Michael Rowley, 3 October 2024
Objection, Helen B. Roberts, 3 October 2024
Objection, Mrs Elizabeth Hiester, 4 October 2024
Objection, Mr Benjamin Lesch, 6 October 2024

Consultee Responses:

Email, London Underground Infrastructure Protection, 18 April 2024
Memo, District Surveyor, 18 April 2024
Memo, Cleansing, 18 April 2024
Letter, Crossrail Safeguarding, 19 April 2024
Email, NATS Safeguarding, 19 April 2024
Letter, Historic England, 22 April 2024
Memo, City Gardens, 22 April 2024
Email, Thames Water, 23 April 2024
Letter, City of Westminster, 23 April 2024
Letter, LB Lambeth, 30 April 2024
Objection, Barbican and Golden Lane Neighbourhood Forum, 05 May 2024
Letter, Greater London Authority, 07 May 2024
Objection, Barbican Association, 07 May 2024
Email, Transport for London Spatial Planning, 08 May 2024
Memo, Air Quality, 08 May 2024
Memo, Planning Obligations, 21 May 2024
Letter, GLAAS, 24 May 2024
Memo, Environmental Health, 28 May 2024
Memo, Lead Local Flood Authority, 31 May 2024
Memo, Environmental Health, 07 June 2024
Email, Transport for London Spatial Planning, 11 June 2024
Memo, District Surveyor, 13 September 2024
Memo, Cleansing, 15 September 2024
Email, GLAAS, 17 September 2024
Email and Letter, Thames Water, 18 September 2024
Letter, City of Westminster, 18 September 2024
Letter, Greater London Authority, 20 September 2024
Memo, Planning Obligations, 23 September 2024
Letter, Historic England, 25 September 2024
Memo, Environmental Health, 25 September 2024
Email, London Underground Infrastructure Protection, 30 September 2024
Letter, Crossrail Safeguarding, 30 September 2024
Email and Letter, Thames Water, 01 October 2024
Objection, Barbican and Golden Lane Neighbourhood Forum, 03 October 2024
Memo, Environmental Health, 04 October 2024
Objection, Barbican Association, 06 October 2024
Letter, Surveyor to the Fabric, 08 October 2024
Letter, LB Lambeth, 08 October 2024.

Application Documents:

Applicant response to TfL comments, Caneparo Associates, 31 May 2024.
Air Quality Assessment, Waterman, February 2024.

Archaeological Desk Based Assessment, Waterman, February 2024, updated May 2024.

Be Seen Spreadsheet, 27 February 2024.

Biodiversity Net Gain Assessment, Waterman, February 2024.

BREEAM Travel Plan, Caneparo Associates, February 2024.

Circular Economy Statement, Twin Earth, 16 February 2024.

Circular Economy Spreadsheet, 27 February 2024.

Cover letter, Montagu Evans, 23 February 2024.

Cultural Plan, Contemporary Art Society Consultancy, February 2024.

Cycling Promotion Plan, Caneparo Associates, February 2024.

Daylight, Sunlight and Overshadowing Report, Point 2, February 2024.

Delivery, Servicing and Waste Management Plan, Caneparo Associates, February 2024.

Design and Access Statement, David Walker Architects, February 2024.

Energy Statement, Twin Earth, February 2024.

Fire Statement, OFR Consultants, 08 February 2024.

Flood Risk Assessment, AKTII, February 2024.

GLA Carbon Emissions Part L Spreadsheet, 27 February 2024.

Health Impact Assessment, Montagu Evans, 08 February 2024.

Landscape and Public Realm Design and Access Statement, Townshend Landscape Architects, February 2024.

Lighting Strategy Planning Statement, MBLD, January 2024.

Noise Impact Assessment, Clarke Saunders, 13 February 2024.

Outline Construction Management Plan, Buro Four, February 2024.

Planning Statement, Montagu Evans, February 2024.

RIBA Stage 2 Access Report, David Bonnett Associates, February 2024.

Security and Structural Safety Statement, QCIC, 07 February 2024, amended 24 May 2024.

Solar Glare Note, Point 2, 18 April 2024.

Statement of Community Involvement, London Communications Agency, February 2024.

Suicide Prevention Statement, David Walker Architects, March 2024.

Surface Water and Drainage Strategy Report, AKTII, February 2024.

Sustainable Design and Construction Statement, Twin Earth, 30 April 2024.

Outdoor Thermal Comfort Report, AKTII, February 2024.

Townscape, Heritage and Visual Impact Report, Miller Hare, February 2024.

Transport Assessment, Caneparo Associates, February 2024.

Utility Statement, WSP, February 2024.

Ventilation Statement, WSP, February 2024.

Whole Life-Cycle Carbon Report, Twin Earth, 16 February 2024.

Whole Life-Cycle Carbon Spreadsheet, February 2024.

Wind Microclimate Assessment, Wind Tunnel, RWDI, 16 February 2024.

Wind Microclimate Assessment, CFD Study, AKTII, February 2024.

Addendum Material

Covering Letter, Montagu Evans, 5 September 2024.
Amended Application Form Section 18, 24 September 2024.
Amended CIL Form, 24 September 2024.
Annotated Basement Plan drawing no. 1094 P5000 Rev A, David Walker Architects.
Be Seen Spreadsheet v.2, Twin Earth, August 2024.
Circular Economy Statement Addendum, Twin Earth, 30 August 2024.
Cultural Plan Addendum, Contemporary Art Society Consultancy, September 2024.
Daylight, Sunlight and Overshadowing Report Addendum, Point 2, August 2024.
Daylight, Sunlight and Overshadowing Supplementary Information, Point 2, 11 October 2024.
Design and Access Statement Addendum, David Walker Architects, September 2024.
Employment Figure Schedule, David Walker Architects, October 2024.
Energy Statement Addendum, Twin Earth, 30 August 2024.
Fire Statement Addendum, OFR Consultants, 04 September 2024.
Landscape and Public Realm Design and Access Statement Addendum, Townshend Landscape Architects August 2024
Lighting Statement Addendum Letter, MBLD, 30 August 2024.
Open Space Drawing SK_1178, David Walker Architects.
Permissive Path Drawing SK_1177, David Walker Architects.
Phasing Diagrams drawing no. SK-1100, David Walker Architects.
Planning Statement Addendum, Montagu Evans, September 2024.
Pre-Demolition Audit Report, ADW Developments, 17 July 2023.
Statement of Community Involvement, London Communications Agency, August 2024.
Sustainability Statement Addendum, Twin Earth, 30 August 2024.
Townscape, Heritage and Visual Impact Report (replacement). Miller Hare, August 2024.
Transport Assessment Addendum, Caneparo Associates, August 2024.
Whole Life Carbon Assessment Addendum, Twin Earth, 30 August 2024.
Wind Microclimate Report CFD Addendum, AKTII, August 2024.
Deconstruction Logistics Plan (as approved under 23/01103/MDC), John F Hunt Ltd, 24 April 2024.
Scheme of Protective Works (as approved under 24/00180/MDC), John F Hunt Ltd, February 2024.
Site Survey Drawings (as approved under 23/00702/MDC), Sir Robert McAlpine.
Updated WLCA Spreadsheet, Twin Earth, October 2024.

APPENDIX A

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 D9 Tall Buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public Toilets
- 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
- Policy T9 Funding transport infrastructure through planning

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).

Draft City Plan 2040

- Draft Strategic Policy S1: Health and Inclusive City
- Draft Policy HL1: Inclusive buildings and spaces
- Draft Policy HL2: Air quality
- Draft Policy HL3: Noise
- Draft Policy HL4 Contaminated land and water quality
- Draft Policy HL5: Location and protection of social and community facilities
- Draft Policy HL9: Health Impact Assessment (HIA)
- Draft Strategic Policy S2: Safe and Secure City
- Draft Policy SA1: Publicly accessible locations
- Draft Policy SA2 Dispersal Routes
- Draft Policy SA3: Designing in Security
- Draft Policy HS3: Residential Environment
- Draft Strategic Policy S4: Offices
- Draft Policy OF1: Office Development
- Draft Policy OF2: Protection of Existing Office Floorspace

- Draft Policy OF3 Temporary 'Meanwhile' Uses
- Draft Strategic Policy S5 Retail and Active Frontages
- Draft Policy RE2 Active Frontages
- Draft Policy RE3 Specialist Retail Uses and Clusters
- Draft Strategic Policy S6: Culture and Visitors
- Draft Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Draft Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Draft Policy CV3: Provision of Visitor Facilities
- Draft Policy CV5 Evening and Night-Time Economy
- Draft Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Draft Policy N1 Infrastructure Provision and Connection
- Draft Policy IN1: Infrastructure Capacity
- Draft Strategic Policy S8: Design
- Draft Policy DE1: Sustainable Design
- Draft Policy DE2: Design Quality
- Draft Policy DE3: Public Realm
- Draft Policy DE4: Terraces and Elevated Public Spaces
- Draft Policy DE5 Shopfronts
- Draft Policy DE6 Advertisements
- Draft Policy DE7: Daylight and Sunlight
- Draft Policy DE8: Lighting
- Draft Strategic Policy S9: Transport and Servicing
- Draft Policy VT1: The impacts of development on transport
- Draft Policy VT2 Freight and Servicing
- Draft Policy VT3: Vehicle Parking
- Draft Strategic Policy S10: Active Travel and Healthy Streets
- Draft Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Draft Policy AT2: Active Travel including Cycling
- Draft Policy AT3: Cycle Parking
- Draft Strategic Policy S11: Historic Environment
- Draft Policy HE1: Managing Change to Historic Environment Development
- Draft Policy HE2: Ancient Monuments and Archaeology
- Draft Strategic Policy S12: Tall Buildings
- Draft Strategic Policy S13: Protected Views
- Draft Strategic Policy S14: Open Spaces and Green Infrastructure
- Draft Policy OS2: City Urban Greening
- Draft Policy OS3: Biodiversity
- Draft Policy OS4: Biodiversity Net Gain
- Draft Policy OS5 Trees
- Draft Strategic Policy S15: Climate Resilience and Flood Risk
- Draft Policy CR1: Overheating and Urban Heat Island Effect
- Draft Policy CR2: Flood Risk

- Draft Policy CR3 Sustainable Drainage Systems (SuDs)
- Draft Policy CR4 Flood Protection and Flood Defences
- Draft Strategic Policy S16: Circular Economy and Waste
- Draft Strategic Policy S23: Smithfield and Barbican Key Area of Change
- Draft Strategic Policy S24: Smithfield
- Draft Strategic Policy S26 Planning Contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Planning for Sustainability, November 2023
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- Barbican and Golden Lane Conservation Area SPD, February 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN,
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD (CoL, July 2016)
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD,
- Barbican Listed Building Management Guidelines SPD, Volumes I, II and IV (2012-2015)
- Protected Views SPD, January 2012
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014);

Relevant Local Plan Policies

CS1 Provide additional offices

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

DM1.1 Protection of office accommodation

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

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

DM1.5 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.

CS3 Ensure security from crime/terrorism

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

DM3.1 Self-containment in mixed uses

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

DM3.2 Security measures

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

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

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

DM3.3 Crowded places

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

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

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.

CS4 Seek planning contributions

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

CS5 Meet challenges facing North of City

To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure.

CS10 Promote high quality environment

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

DM10.1 New development

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;

- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

DM10.3 Roof gardens and terraces

- 1) To encourage high quality roof gardens and terraces where they do not:
 - a) immediately overlook residential premises;
 - b) adversely affect rooflines or roof profiles;
 - c) result in the loss of historic or locally distinctive roof forms, features or coverings;
 - d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

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

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

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials;
- d) include signage only in appropriate locations and in proportion to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;
- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

DM10.6 Advertisements

- 1) To encourage a high standard of design and a restrained amount of advertising in keeping with the character of the City.
- 2) To resist excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

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

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

CS11 Encourage art, heritage and culture

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

DM11.2 Public Art

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

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

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

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

DM12.4 Archaeology

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

CS13 Protect/enhance significant views

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

CS14 Tall buildings in suitable places

To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

CS15 Creation of sustainable development

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

DM15.1 Sustainability requirements

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

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
 - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;

- b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
- c) where on-site carbon emission reduction is unviable, offsetting of residual CO₂ emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
- d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NO_x).
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.

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.

DM15.8 Contaminated land

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

CS16 Improving transport and travel

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

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
 - a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;

- d) public transport;
 - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

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

DM16.4 Encouraging active travel

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

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

CS17 Minimising and managing waste

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

DM17.1 Provision for waste

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

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

DM17.2 Designing out construction waste

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

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

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM18.3 Flood protection and climate

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

CS19 Improve open space and biodiversity

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

DM19.2 Biodiversity and urban greening

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

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

CS20 Improve retail facilities

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

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:
 - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
 - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

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

CS22 Maximise community facilities

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

DM22.1 Social and community facilities

1. To resist the loss of social and community facilities unless:
 - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
 - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - c) it has been demonstrated that there is no demand for another similar use on site.
2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.
3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:
 - a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
 - b) in locations which are convenient to the communities they serve;
 - c) in or near identified residential areas, providing their amenity is safeguarded;
 - d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

APPENDIX B

Methodologies for Assessing Daylight, Sunlight and Overshadowing

New Development

The BRE guidelines (2022) present the following methodologies and standards for measuring light levels within new developments.

Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window (irrespective of the size of the window). If the VSC is:

- At least 27%, a conventional window design would usually allow for reasonable amounts of daylight;
- Between 15% and 27%, special measures (larger windows, changes to room layout) are usually needed to provide adequate daylight;
- Between 5% and 15%, it is very difficult to provide adequate daylight unless very large windows are used;
- Less than 5%, it is often impossible to achieve reasonable daylight, even if the whole window wall is glazed.

Sunlight to windows: In general, a dwelling, or non-domestic building, that has a particular requirement for sunlight, will appear reasonably sunlit provided:

- at least one main window wall faces with 90 degrees of due south; and
- a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March. This is assessed at the inside of the window; sunlight received by different windows can be added provided they occur at different times and sunlight hours are not double counted.

Interior Daylighting Recommendations

The British Standard “Daylight in buildings” (BS EN 17037) contains advice and guidance on interior daylighting. A UK National Annex sets out specific minimum recommendations for habitable rooms in dwellings in the United Kingdom.

Illuminance Method: This method uses climatic data to calculate daylight illuminance at each point on an assessment grid within a room (usually 0.85m from the floor level), using sun and sky conditions, derived from standard meteorological data. This analytical method allows the calculation of absolute daylight illuminance taking account of a building’s location and orientation. The UK National Annex recommends the following minimum illuminance levels that should be exceeded over at least 50% of the assessment grid within a room for the following habitable room types, with vertical and / or inclined windows, for at least half of the daylight hours:

- 100 lux for bedrooms
- 150 lux for living rooms
- 200 lux for kitchens

Where a room has a shared use, the highest target should apply, such as living/kitchen/dining rooms and studios. In a bed sitting room/studio in student accommodation, the value for a living room should be used if students are considered likely to often spend time in their rooms during the day.

Daylight Factor Method: This method involves the calculation of the daylight factors at each calculation point on an assessment grid within a room or space. The daylight factor is the illuminance at a point on the assessment grid in a space, divided by the illuminance on an unobstructed horizontal surface outdoors. This method of assessment uses an overcast sky model, which means that the orientation and location of the building assessed is not relevant. The UK National Annex recommends the following minimum target daylight factors that should be achieved over at least 50% of the assessment grid within a room for the following habitable room types for at least half of the daylight hours in a year: 0.7% for bedrooms; 1.1% for living rooms; and 1.4% for kitchens.

Both the illuminance method and daylight factor method require assessment via detailed computer software to simulate the illuminance or daylight factor at calculation points on the assessment grid within a proposed space. The inputs for these methods of assessment would normally include internal and external surfaces and their reflectance values (which should reflect real or specified conditions, or default values recommended by the BRE guidelines), window types and glazing transmission.

Existing Buildings

Daylight to Existing Buildings

The BRE guidelines (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

- 1. Daylight to windows: Vertical Sky Component (VSC):** a measure of the amount of sky visible from a centre point of a window (irrespective of the size of the window). The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20%

or more from the existing level (0.8 times the existing value), the loss would be noticeable.

- 2. Daylight Distribution: No Sky Line (NSL):** The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

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

Sunlight to Existing Buildings

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

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

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

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

Interpreting Assessment Data

In undertaking assessments, a judgement is 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. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment, which are referenced in Appendix H of the BRE guidelines and have become part of an industry standard utilised by Daylight and Sunlight consultants. It is for the Local Planning Authority to decide whether any losses would result in a reduction in amenity which is or is not acceptable.

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

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

Setting Alternative Target Values (including Mirror Massing)

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

Alternative targets may be generated from the scale/layout of existing development within the surrounding context or be based on an extant planning permission. The BRE guide provides an example of a narrow mews in an historic city centre where the VSC values derived from the obstruction angle could be used as a target value for development in that street if new development is to match the existing layout.

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

Opens Spaces

Overshadowing

Sunlight to open spaces: Sunlight Hours on the Ground (SHOG): The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21 March.

For existing open spaces, if as a result of a proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

Assessing the Cumulative Impact of Development Proposals

Paragraph 3.10.41 of the Local Plan and paragraph 6.1.59 of the draft City Plan state that “when considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals”. The impact of a proposed development on the daylight and sunlight received by neighbouring properties and open spaces is assessed against the light levels in the existing scenario. When assessing the cumulative impact of development proposals, the impact of the proposed development would be assessed alongside any other nearby developments with either full planning permission, a resolution to grant consent, those development proposals that have been submitted but not yet determined and / or potential future applications that due to be submitted (none of which have been completed). In undertaking an assessment of the cumulative impact of such development proposals it can be determined the extent to which the impact of each development proposals can be attributed. It should be noted that previous completed developments are considered to form part of the existing baseline against which the development proposals would be assessed.

Supplementary Methods of Assessment

Radiance Based Daylight Factor Assessment

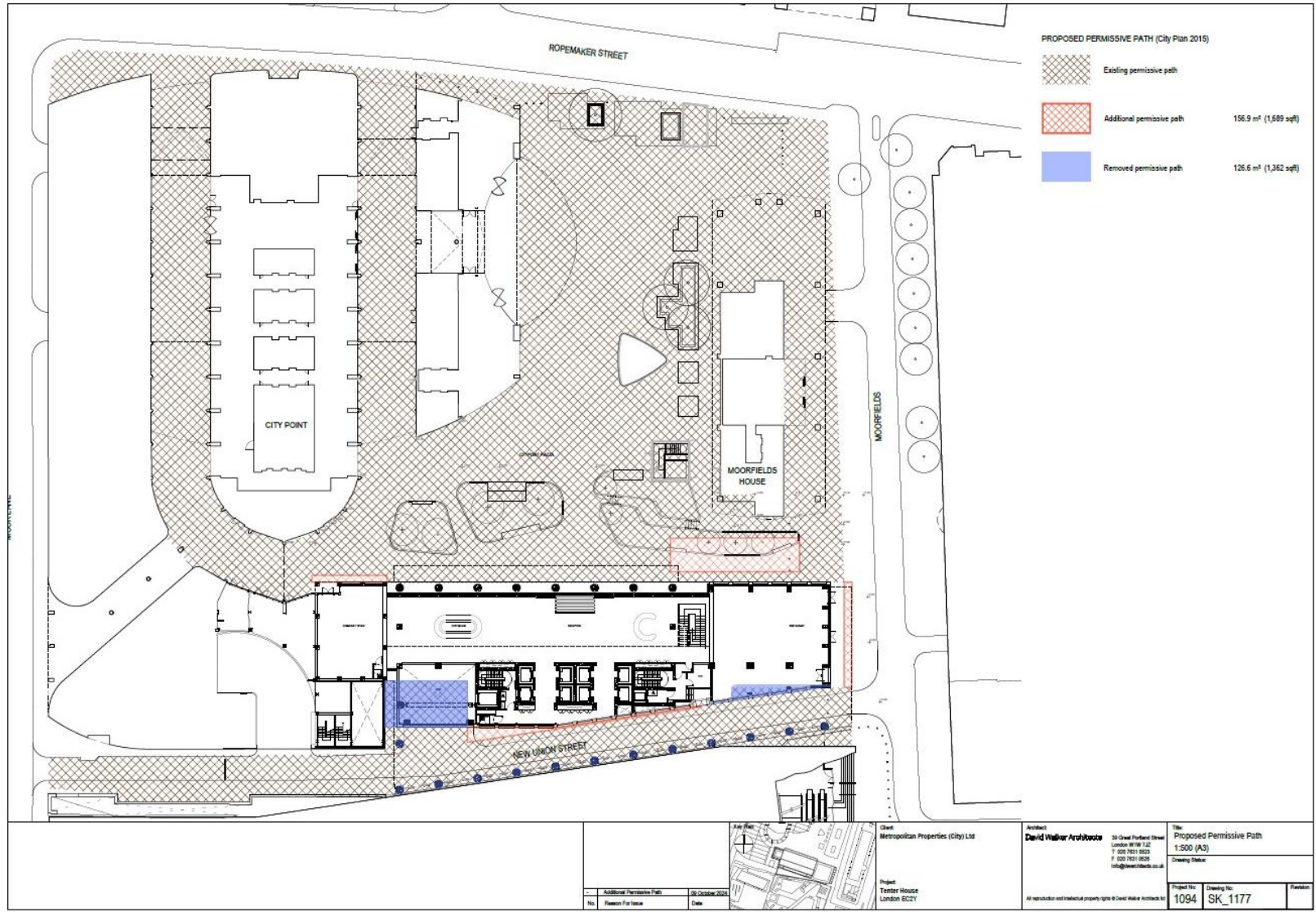
A radiance-based daylight factor assessment is a lighting simulation tool that measures the individual ‘daylight factors’ at a number of given points (usually based on a grid) within a room (or defined space). This method of assessment takes into account the total glazed area to a room, the transmittance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

Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the radiance methodology, radiance-based assessments can draw upon the BRE's Average Daylight Factor (ADF) target values (2011), which recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The 2011 BRE guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. These minimum target values are comparable with the minimum standards set out in the UK National Annex of BS EN 17037.

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

It should be noted that the radiance-based daylight factor assessment is not meant to replace a submitted BRE based daylight and sunlight assessment, but to provide an additional assessment to illustrate the daylight levels within habitable rooms, including within neighbouring properties.

APPENDIX C – Proposed Permissive Path Plan



APPENDIX D – Proposed Open Space Plan



| | | | | | | | | | | | | | |
|--|--|------------------------------------|---------|-----------------------------|---|-----------|--|-------|-----------------------------------|-------------|------|-------------|---------|
| <table border="1"> <tr> <td>Client</td> <td>Metropolitan Properties (City) Ltd</td> </tr> <tr> <td>Project</td> <td>Tester House London EC2Y</td> </tr> </table> | Client | Metropolitan Properties (City) Ltd | Project | Tester House London EC2Y | <table border="1"> <tr> <td>Architect</td> <td>David Walker Architects 20 Great Portland Street London W1W 7JZ T: 020 7631 0523 F: 020 7631 0529 info@dwainarchitects.co.uk</td> </tr> <tr> <td>Title</td> <td>Proposed Open Space 1:500 (A3)</td> </tr> <tr> <td>Project No.</td> <td>1094</td> </tr> <tr> <td>Drawing No.</td> <td>SK_1178</td> </tr> </table> | Architect | David Walker Architects 20 Great Portland Street London W1W 7JZ T: 020 7631 0523 F: 020 7631 0529 info@dwainarchitects.co.uk | Title | Proposed Open Space 1:500 (A3) | Project No. | 1094 | Drawing No. | SK_1178 |
| Client | Metropolitan Properties (City) Ltd | | | | | | | | | | | | |
| Project | Tester House London EC2Y | | | | | | | | | | | | |
| Architect | David Walker Architects 20 Great Portland Street London W1W 7JZ T: 020 7631 0523 F: 020 7631 0529 info@dwainarchitects.co.uk | | | | | | | | | | | | |
| Title | Proposed Open Space 1:500 (A3) | | | | | | | | | | | | |
| Project No. | 1094 | | | | | | | | | | | | |
| Drawing No. | SK_1178 | | | | | | | | | | | | |

APPENDIX E – Proposed Construction Stages Plan

Phase 1: Demolition of existing building down to slab level

Phase 2: Plaza Works

- 2m hoarding line within Plaza during construction
- Demolish existing plaza slab
- Construct new Plaza basement
- Construct new Plaza Slab
- Install new plaza landscaping

Phase 3: Tenter House Basement

- Demolish existing ground and basement slabs
- Construct new Tenter House basement including ground floor slab
- New Union Street closed during construction

Phase 4: Construction

- Construct Tenter House - Ground floor upwards.
- Complete and open New Union Street
- Complete 2m of plaza in front of Tenter House

| | | Client: Metropolitan Properties (City) Ltd | Architect: David Walker Architects 35 Great Portland Street London W1W 7JZ T: 020 7631 0029 F: 020 7631 0028 info@dwalkera.com | Title: Phasing Diagrams | | | | | | | |
|--|--------------------|--|---|-----------------------------------|--|--|--|------------------------|----------------------------|-------------------------------|---------------|
| <table border="1" style="border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>Revision For Issue</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | No. | Revision For Issue | Date | | | | Project: Tenter House London EC2Y | Drawing Status: F10 | Project No: 1084 | Drawing No: SK-1100 | Revision: |
| No. | Revision For Issue | Date | | | | | | | | | |
| | | | | | | | | | | | |

SCHEDULE

APPLICATION: 24/00209/FULMAJ

Tenter House 45 Moorfields London

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b)) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ.

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 The proposed development shall provide a total floor area of 35,533 sq.m GEA in accordance with the approved plans, comprising:
33,758 sq.m GIA Class E(g)(i) offices;
287 sq.m. GIA Class E(a/b) retail; and
142 sq.m GIA Class F2(B) community floorspace.
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.
- 3 Prior to commencement of the following stages, a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction shall be submitted to and approved in writing by the Local Planning Authority.
 - (a) Above and below ground works related to the Plaza, including demolition of the Plaza slab;
 - (b) works beneath the footprint of the building (including demolition of the building basement and slab);
 - (c) construction of the above ground building.

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

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

- 4 Demolition of the existing Class E structure remaining on site [following demolition of all other above ground structures carried out pursuant to planning permission 17/01050/FULMAJ (dated 23.09.2020)] shall be carried out in accordance with the Scheme of Protective Works Revision 08 dated February 2024 by John F Hunt Ltd as hereby approved under condition 83 (Approved Drawings) of this permission.

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.

- 5 Prior to the commencement of relevant works, unless otherwise agreed with the Local Planning Authority, the following works shall be undertaken, for (1) the works to the plaza and (2) the works to the main building, in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due consideration given to impact of development works (including remediation) on off-site receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events):

- a. a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development.

- b. an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work.

c. where remediation is required, a remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. 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 and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved.

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.

- 6 Prior to occupation and unless otherwise agreed with the Local Planning Authority, a verification report produced in accordance with LCRM and other associated guidance detailing the remediation measures completed and final condition of the site must be submitted to and approved in writing by the Local Planning Authority.

The developer must include a statement to confirm that the site development is safe, suitable for its intended use, and would not be considered under Part 2A of the Environmental Protection Act 1990.

REASON: To ensure that the development is safe and suitable for its intended use for the future users of the land, neighbouring land, and that risks to controlled waters, property and ecological systems are minimised, in accordance with the Local Plan DM15.8. These details are required prior to occupation in order that appropriate evidence of the remedial works is agreed and accepted by the Local Planning Authority prior to any potential exposure of occupiers or harm to the environment from land contamination.

- 7 Should unexpected contamination be identified during development hereby approved, the Local Planning Authority must be notified in writing within five working days. An investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management.

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.

- 8 Before any piling or construction of basements is commenced for the building [excluding the plaza], 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.

- 9 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)(i) Fully detailed design, schematic and layout drawings for the proposed SuDS components including but not limited to in relation to the Plaza works: rainwater harvesting, attenuation systems (including green-blue roofs and the above ground tank), rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance including silt removal; surface water flow rates shall be restricted to no greater than 2.59 l/s from the building, provision should be made for an attenuation volume capacity capable of achieving this, the area allowed to free drain shall be no greater than 1390 square meters;

(a)(ii) Fully detailed design, schematic and layout drawings for the proposed SuDS components including but not limited to in relation to the main Building works: rainwater harvesting, attenuation systems (including green-blue roofs and the above ground tank), rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance including silt removal; surface water flow rates shall be restricted to no greater than 2.59 l/s from the building, provision should be made for an attenuation volume capacity capable of achieving this, the area allowed to free drain shall be no greater than 1390 square meters;

(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.

(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

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.

- 10 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be

carried out in accordance with the approved details:

(a) A Lifetime Maintenance Plan for the SuDS system to the building 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.

- 11 Prior to the commencement of construction works to the office building, a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 12 Demolition works [save for that demolished pursuant to 17/01050/FULMAJ and the demolition of the Class E unit which shall be carried out in accordance with condition 13 of this permission] 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 and construction shall not be carried out otherwise than in accordance with the approved Deconstruction and Construction Logistics Plans(s) 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.

- 13 Demolition of the existing Class E structure remaining on site [following demolition of all other above ground structures carried out pursuant to planning permission 17/01050/FULMAJ (dated 23.09.2020)] shall be carried out in accordance with the Site Demolition Logistics Plan Revision 03 dated 24.04.2024 by John F Hunt Ltd as hereby approved under condition 83 (Approved Drawings) of this permission.

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.

- 14 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.

- 15 No works including demolition of the Plaza and Building basement floorslabs shall be commenced until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provides details on all proposed structures;

- provides details on the use of tall plant/scaffolding;
 - accommodates the location of the existing London Underground structures;
 - demonstrates access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
 - demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
 - accommodate ground movement arising from the construction thereof;
- and
- mitigate the effects of noise and vibration arising from the adjoining operations within the structures.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed in their entirety, before any part of the building hereby permitted is occupied.

REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

- 16 Construction works shall not commence until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provides details on all proposed structures;
 - provides details on the use of tall plant/scaffolding;
 - accommodates the location of the existing London Underground structures;
 - demonstrates access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
 - demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
 - accommodate ground movement arising from the construction thereof;
- and
- mitigate the effects of noise and vibration arising from the adjoining operations within the structures.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed in their entirety, before any part of the building hereby permitted is occupied.

REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan

2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

- 17 All Parish Markers and commemorative plaques stored from the cleared site shall be carefully reinstated and retained for the life of the building on the new building in accordance with detailed specifications including location and fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to occupation of the development hereby approved.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.

- 18 No works [other than demolition of the existing building, pursuant to planning permission 17/01050/FULMAJ, and the plaza works] shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

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

- 19 No demolition or development [other than demolition of the existing Class E unit and the works to the plaza] shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.

B. Where appropriate, details of a programme for delivering related positive public benefits.

C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

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

- 20 No development other than works to the plaza and works associated with its delivery 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.

- 21 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, for both (a) the plaza and (b) the above ground building, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works for the relevant part of the development hereby permitted are begun. The mitigation measures shall be maintained for the life of the building.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 22 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.
- (b) particulars and samples of the materials to be used on all external surface treatments in areas where the public would have access, including external ground and plaza;
- (c) full details of the public spaces, including flooring, entrances, planters, steps, seating, lighting, soffits, drainage, irrigation, bollards, hand-rails, balustrades, staircases and steps, and any infrastructure required to deliver programmed and varied uses;
- (d) details of the proposed new external and semi-external facades including details of a typical bay detail of the development for each façade,

specifying jointing where appropriate including any necessary expansion/movement joints;

(e) mock up sample of the glazing system to test solar glare;

(f) details of the rooftop including any plant equipment, green roof, brise soleil and photovoltaic panels, horticulture screen wiring, planters, acoustic screening and louvres;

(g) details of all proposed new signage including fixings, maintenance and any incorporated lighting;

(h) Details of the proposed terraces and balconies including doors and thresholds, soffits, balustrades, planters, seating, irrigation, drainage, and surface treatments;

(i) Details of lower ground, ground, first and second floor elevations including all entrances inclusive of the loading bay, specifying any security shuttering as well as all soffits and supporting columns including their interface at ground level;

(j) Full details of the proposed cultural installation to New Union Street including hanging public art fixture fixings, external visual experience, lighting levels and maintenance plan;

(k) Details of 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; and

(n) Details of the integration of M&E and building services into the external envelope.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.2, DM10.3, DM10.5, DM10.6, DM10.8, DM15.7, DM19.2.

23 Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) details of all soft landscaping, including the position, size and types of plants, specifying their seasonal interest, in addition to details of their respective planting beds and substrate requirements, and their contribution to biodiversity, rainwater attenuation, and local habitat;

(b) details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights, overall height, canopy size when installed and when mature; and details of tree pits/trenches and growing medium for soft and hard surfaces and their respective top and subsoil requirements as per British standards;

(c) Full details of the proposed hard landscaping including all surface treatments and urban furniture including paving details and samples in accordance with the City Public Realm Technical Manual. Details should include all planters, seating, refuse bins, lighting, handrails, drainage, irrigation and any infrastructure required to deliver programming and varied uses;

- (d) details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement irrigation;
- (e) details of the method of irrigation and nutrient delivery systems for all soft landscaped areas;
- (f) details of the Landscape management and maintenance plan (LMMP) for all soft and hard landscaping, including ecological management and street furniture for all proposed landscaping.

The landscaping scheme shall take into account the wind mitigation measures identified in the 'Wind Microclimate Report - CFD Study' prepared by AKTII (dated February and August 2024) and the 'Tenter House Pedestrian Level Wind Microclimate Assessment - Wind Tunnel Study' prepared by RWDI (dated 16 February 2024). 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: 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: DM10.2, DM10.3, DM18.2, DM18.3.

- 24 Before the relevant works are commenced, an Inclusive Public Realm Strategy shall be submitted to and approved in writing by the Local Planning Authority. This shall include details of gradients, crossfalls, planting, details of security measures (i.e. bollards), seating, surface materials, boundary edges, lighting, hazard protection and appropriate resting points throughout the public realm. The management and operation of the public realm shall be carried out in accordance with the approved Inclusive Public Realm Strategy for the lifetime of the development, alterations to which may be agreed in writing by the Local Planning Authority.

REASON: To achieve an environment that meets the highest standards of accessible and inclusive design in all developments, open spaces and streets, in accordance with Local Plan policy DM10.8.

- 25 Before the works thereby affected are begun, mock up 1:1 sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority.

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.

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

- a) Lighting layout/s;
- b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);
- c) A lighting control methodology;
- d) 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;
- e) All external, semi-external and public-facing parts of the building including terraces and balconies as well as 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;
- f) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.

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

- 27 Prior to commencement excluding demolition, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, cultural uses and any other relevant uses shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.

- 28 Details of a public art strategy for proposed installation to New Union Street demonstrating: commissioning process; artistic merit; appropriateness to siting; inclusivity, deliverability; maintenance; management and engagement with Culture Mile BID, City Arts Initiative and wider community; implementation programme; and environmental impact; shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the relevant works. The public art strategy as approved shall be installed prior to first occupation and remain in situ for the lifetime of the development.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM 11.2.

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

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

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

- 31 The roof terraces hereby permitted on the 14th and 19th floor levels shall not be used or accessed between the hours of 18:00 on one day and 08:00 on the following day, and not at any time on Saturdays. 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.

- 32 The roof terraces hereby permitted on the east elevation shall not be used or accessed between the hours of 21:00 on one day and 08:00 on the following day and not at any time on Saturdays, 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.

- 33 No amplified of other music shall be played on the roof terraces.

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

- 34 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

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

- 35 No servicing of the premises shall be carried out between the hours of 23 :00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. No vehicles that are required to reverse into or out of the loading bay shall service the development after 21:00. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

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

- 36 Self-closing mechanisms must be fitted on the doors at street entrances before the Class E(a/b) (Café/Restaurant) use commences and shall be retained for the life of the premises. The doors must not be left open except 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.
- 37 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 38 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
- 39 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class E (a/b) (Restaurant) uses. 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 individual Class E(a/b) (Café/Restaurant) uses 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.
- 40 No cooking shall take place within any Class E (a/b) (Café/Restaurant) unit 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.

- 41 The Class E(a/b) (Café/Restaurant) 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 nearby residents, adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 42 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.
- 43 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the loading area as shown on the approved drawings.
REASON: To ensure satisfactory servicing facilities in accordance with the following policy of the Local Plan: DM16.5.
- 44 Details of the design and acoustic properties of the loading bay door shall be submitted to and approved by the Local Planning Authority before any works thereby affected are begun and shall be maintained for the life of the building.

REASON: To ensure a satisfactory external appearance and to minimise disruption to nearby residents in accordance with the following policies of the Local Plan: DM10.1 and DM21.3.
- 45 Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.
- 46 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.

- 47 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety and to accord with Section 153 of the Highways Act 1980.
- 48 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 472 long stay spaces and 34 short stay spaces. A maximum of 10% of the cycle storage facilities should be for folding bicycles. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
- 49 Changing facilities and showers shall be provided to accommodate 345 lockers and 33 showers and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.

REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 50 A minimum of 5% of the long stay cycle spaces (23 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 DMI0.8 and London Plan policy TS cycling.
- 51 Provision shall be made for disabled people to obtain access to the offices, community use and retail unit via their respective principal entrances without the need to negotiate steps and shall be maintained for the life of the building.

REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: DM10.8.
- 52 None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling, any temporary works, and site investigations, have been submitted to and approved in writing by the Local Planning Authority which:-
- i. Accommodate the Elizabeth line infrastructure, including any temporary works associated with the Elizabeth line (formerly known as Crossrail),

ii. Mitigate the effects on the Elizabeth line, of ground movement arising from the development. The development shall be carried out in all respects in accordance with the approved design and method statements.

All structures and works comprised within the development hereby permitted which are required by paragraphs C1(i) and C1 (ii) of this condition shall be completed, in their entirety, before any part of the building[s] hereby permitted is/are occupied.

REASON: To ensure that the development does not prejudice operation of Crossrail and to protect the amenity of occupiers of the proposed building in accordance with the following polices of the Local Plan: CS5, DM16.1.

53 The development shall be carried out in accordance with the approved details within the Fire Strategy Document by OFR dated 04 September 2024.

REASON To ensure that the development incorporates the necessary fire safety measures in accordance with London Plan D5 and D12.

54 Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.

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

55 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

56 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 S11D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

57 The maximum heights of the approved building shall be as follows:
- 95.25m AOD to top of main roof level; 71.55m AOD to top of 14th floor level balustrade.

REASON: In the interests of visual amenity and heritage protection in accordance with the following policies of the Local Plan: DM10.1, CS12 and CS14.

- 58 Prior to first use of the building upon completion of development, the basement shall be fitted with a positive pumped device designed to remove sewer water from the building, which shall be maintained and functional at all times.
REASON - To protect the building from sewer flooding, in accordance with the following policy: DM18.3.

- 59 Prior to the commencement of the development (excluding demolition and works to the plaza), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building elements and of the interventions in order to distinguish the historic from the new fabric. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the life-cycle of the development.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and Page 153 122 draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2040; S16. 11.

- 60 No later than 3 months after completion of the building and prior to the development being occupied, a post-construction Circular Economy Statement shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.

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

- 61 Prior to the commencement of the development, excluding demolition, works to the plaza and below-ground works of the development, a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions savings for modules A1 - A5 of the development achieve at least the GLA standard benchmark and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle

Carbon Assessment Guidance, and that modules B - C of the development aim to achieve at least the GLA standard benchmark. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.

REASON: To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2040: DE 1.

- 62 Once the as-built design has been completed (upon commencement of RIBA Stage 6) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon Page 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.

- 63 The development shall be designed to allow for connection into a district heating network if this becomes available during the lifetime of the development. This is to include a strategy with relevant plan drawings for: equipment, allocation of plant space and a protected route for connection in and out of the site.

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. draft City Plan 2040 policy S7.

- 64 A post construction BREEAM assessment demonstrating that a minimum target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve a minimum 'Excellent' rating) shall be submitted as soon as practicable after practical completion.

REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2, draft City Plan 2040; DE1

- 65 Further to the approval of landscaping and urban greening details as set out in Conditions 23 and 67 of this permission, prior the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations, monitoring and management.

REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development.

- 66 Within 6 months following completion, details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species, scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development.

REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2040 policy OS2 City Greening and OS3 Biodiversity.

- 67 Details of the position and size of the green roof(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

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

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

photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

REASON: To comply with Local Plan Policy DM 15.5 for Climate change resilience and adaptation and draft City Plan 2040: S15.

- 69 Within 6 months of completion, details of climate change resilience measures must be submitted to the Local Planning Authority, demonstrating the measures that have been incorporated to ensure that the development is resilient to 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 DM15.5 for Climate Change Resilience and adaptation, and draft City Plan 2040 policy S15.

- 70 The floorspace within the development marked as community floorspace on the floorplans at ground floor level hereby approved, shall be used for local community (Class F2(b)) and for no other purpose (including any other purpose within Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure compliance with policy S6 of the Draft City Plan 2040.

- 71 The floorspace within the development marked as restaurant/cafe floorspace on the floorplans at ground floor level hereby approved, shall be used for restaurant/cafe (Class E(a/b)) and for no other purpose (including any other purpose within Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure compliance with policy S5 of the Draft City Plan 2040.

- 72 No piling to the Plaza shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe 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 and piling layout plan.

REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

- 73 No piling to the Building shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe 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 and piling layout plan.

REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB.

- 74 No piling to the Plaza 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) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe 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 and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above

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

- 75 No piling to the building 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) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe 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 and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

- 76 There shall be no occupation beyond the first 19,000sqm of office space at 1.5l/s until confirmation has been provided that either:
- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or
- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied.
Where a development and infrastructure phasing plan is agreed no occupation of the additional floorspace shall take place other than in accordance with the agreed development and infrastructure phasing plan.
REASON: The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues.

- 77 Prior to the commencement of development, save for demolition and all works to the plaza, details of the utility connection requirements of the development (or relevant part thereof) including all proposed service connections, communal entry chambers, the proposed service provider and the anticipated volume of units required for the development and a programme for the ordering

and completion of service connections from the utility providers have been submitted to the local planning authority for approval in writing. No service connections shall be ordered in connection with the development unless in accordance with the final programme approved pursuant to this condition.

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

- 78 Prior to implementation, a Public Realm Management Plan shall be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. The management and operation of the public realm shall be carried out in accordance with the Public Realm Management Plan for the lifetime of the development, alterations may be agreed in writing by the Local Planning Authority.

REASON: To ensure that the Local Planning Authority may be satisfied with the management and operation of publicly accessible areas in accordance with the Public London Charter LPG and London Plan (2021) Policy D8

- 79 Prior to commencement of the new structural core, details of the proposed lifts shall be submitted to and approved in writing by the Local Planning Authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.

REASON: To ensure that the development is accessible for disabled people in accordance with the following policy of the Local Plan: DM10.8. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 80 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) Details of all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate;
- b) Details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation, thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20;
- c) Details of office reception including details of reception facilities and the access between the office lobby and first floor office;
- d) Security measures including provision of wider aisle gates at all controlled points of entry;
- e) Details of soft spot between level 02 -13;
- f) Details of the cycle stand types and setting out of long stay cycle spaces, including swept paths, and end of trip facilities and access routes;
- g) Details of step free access to the cycle store and end of trip facilities;
- h) Details of City Place Plaza and all terraces including path widths and seating;

i) Details of the layout of the wheelchair accessible WC on the ground floor of the office building (the WC pan should be located on the shortest wall);

j) Details of left and right hand transfer wheelchair accessible WC facilities in the new office building;

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

81 Prior to the occupation of the development, an Inclusive Access Management Plan 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 which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for:

a. Website information including photos/visual story and an easy read version with information on:

i. Travel distances in metres from key step-free points of arrival including identified rest points at intervals of no more than 50m

ii. Location of dropped kerbs

b. Facilities available on-site including dimensions and photos for (as appropriate):

i. entrances and lift access

ii. controlled entry points

iii. accessible toilets including protocol for access to Radar key if applicable

iv. facilities for assistance animals

v. assistive listening system and other assistive technology

vi. rest and recovery facilities/quiet room

vii. room for reflection/prayer room

c. Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering.

The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.

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

82 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.

83 Before any works thereby affected are begun details of measures to prevent jumping or falling from the development (including the publicly accessible roof terrace) shall be submitted to and approved in writing by the Local Planning

Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development.

REASON: In the interests of safety in accordance with the following polices of the draft City Plan 2040: DE2 and DE5.

- 84 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:

P0100 Rev B Site Location Plan; P0101 Rev B Site Plan; P0199 Rev C; P0200 Rev C; P0201 Rev B; P0202 Rev B; P0203 Rev B; P0204 Rev B; P0205 Rev B; P0206 Rev B; P0207 Rev B; P0208 Rev B; P0209 Rev B; P0210 Rev B; P0211 Rev B; P0212 Rev B; P0213 Rev B; P0214 Rev B; P0215 Rev B; P0216 Rev B; P0217 Rev B; P0218 Rev B; P0219 Rev B; P0220 Rev B; P0221 Rev B; P0300 Rev B; P0301 Rev B; P0302 Rev B; P0303 Rev B; P0310 Rev B; P0311 Rev B; P0312 Rev B; P0313 Rev B; P0400 Rev B; P0401 Rev B; P0410 Rev B; P0411 Rev B; P0412 Rev B; P0413 Rev B; P0414 Rev B; P0415 Rev B; P0416 Rev B; P4100 Rev B; P4101 Rev B; P4102 Rev B; P4103 Rev B; P4104 Rev B; P4110 Rev B; P4111 Rev B; P4112 Rev B; P4113 Rev B; P4114 Rev B; P4115 Rev B; P4116 Rev B; P4117 Rev B; P4118 Rev B; P4119 Rev A; P4120 Rev A; P5000 Rev A; P5001 Rev A.

Topographic Survey Drawing Numbers 01586-GEO-XX-ZZ-SU-U-1001 P02 and 01586-SRM-XX-ZZ-SU-U-1001 P02.

Site Deconstruction Logistics Plan Rev 03, John F Hunt Ltd, 24.04.2024.

Scheme of Protective Works Rev 08, John F Hunt Ltd, February 2024.

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 Consultation and engagement with the local community should be undertaken where relevant as submissions to discharge conditions are developed in line with the expectations set out in the City's Developer Engagement Guidance (May 2023).
- 2 In relation to the relevant archaeology condition written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

- 3 The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office 185GBP per sq.m

Retail 165GBP per sq.m

Hotel 140GBP per sq.m

All other uses 80GBP per sq.m

These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of 75GBP per sq.m for offices, 150GBP per sq.m for Riverside Residential, 95GBP per sq.m for Rest of City Residential and 75GBP for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

- 4 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

5 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:

(a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.

(b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.

(c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.

(d) Bridges over highways

(e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.

(f) Declaration, alteration and discontinuance of City and Riverside Walkways.

(g) The provision of City Walkway drainage facilities and maintenance arrangements thereof.

(h) Connections to the local sewerage and surface water system.

(i) Carriageway crossovers.

(j) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".

6 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:

(a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.

(b) Installation of engine generators using fuel oil.

(c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.

(d) Alterations to the drainage and sanitary arrangements.

(e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:

- the identification, encapsulation and removal of asbestos in accordance with a planned programme;
- provision for window cleaning (internal and external) to be carried out safely.

(f) The use of premises for the storage, handling, preparation or sale of food.

(g) Use of the premises for public entertainment.

(h) Approvals relating to the storage and collection of wastes.

(i) The detailed layout of public conveniences.

(j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.

(k) The control of noise from plant and equipment;

(l) Methods of odour control.

7 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Noise and Dust

(a)

The construction/project management company concerned with the development must contact the Department of Markets and Consumer

Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b)

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

(c)

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

(d)

Deconstruction or Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department including payment of any agreed monitoring contribution.

Air Quality

(e)

Compliance with the Clean Air Act 1993

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

Boilers and CHP plant

(f)

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

<40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

(g)

All gas Combined Heat and Power plant should be low NOX technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.

(h)

When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(i)

Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

Standby Generators

(j)

Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

(k)

There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.

Cooling Towers

(l)

Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

Noise Affecting Residential Properties

(m)

The proposed residential flats are close to busy roads and are in an existing commercial area which operates 24 hours a day. The scheme should include effective sound proofing of the windows and the provision of air conditioning or silent ventilation units to enable the occupants to keep their windows closed

to benefit from the sound insulation provided. This may need additional planning permission.

(n)

The proposed residential units are located in a busy City area that operates 24 hours a day and there are existing road sweeping, deliveries, ventilation plant and refuse collection activities that go on through the night. The units need to be designed and constructed to minimize noise disturbance to the residents. This should include acoustic treatment to prevent noise and vibration transmission from all sources. Sound insulation treatment needs to be provided to the windows and either air conditioning provided or silent ventilation provided to enable the windows to be kept closed yet maintain comfortable conditions within the rooms of the flat. This may need additional planning permission.

Ventilation of Sewer Gases

(o)

The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Food Hygiene and Safety

(p)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

(r)

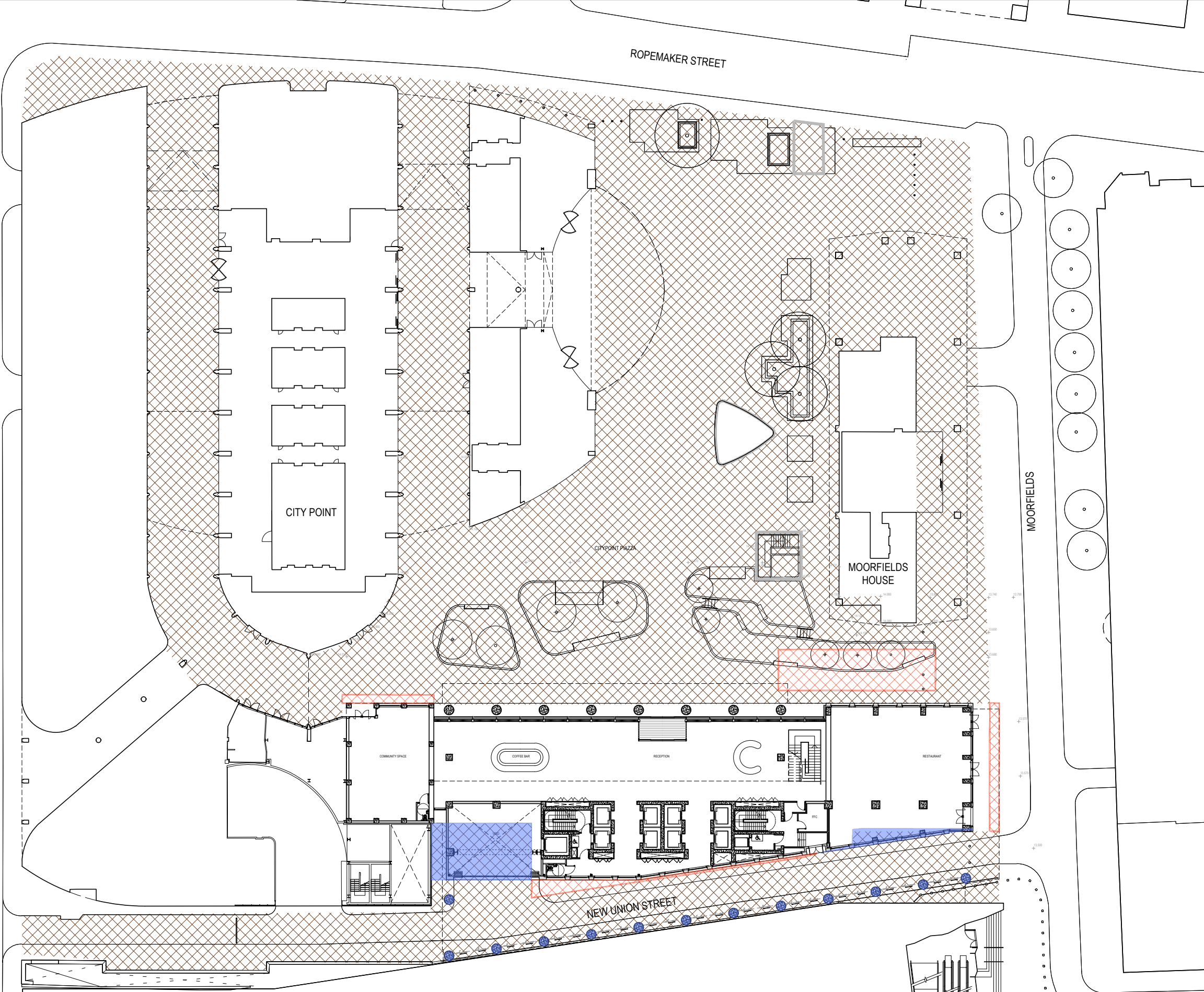
From the 1 July 2007, the Health Act 2006 and associated Regulations prohibited the smoking of tobacco products in all enclosed or partially enclosed premises used as workplaces or to which the public have access. All such premises are required to provide signs prescribed by Regulations. Internal rooms provided for smoking in such premises are no longer permitted. More detailed guidance is available from the Markets and Consumer Protection Department (020 7332 3630) and from the Smoke Free England website: www.smokefreeengland.co.uk.

- 8 You are advised to contact the Markets and Consumer Protection Department who will advise in respect of Food Hygiene and Safety, Health and Safety at Work, Environmental Impact and any other matters relevant to that department. Should the Markets and Consumer Protection Department require any external design alterations you should advise the Planning Department which will advise as to whether planning permission will be required for such works.
- 9 Ventilation for any kitchens will need to be provided to roof level. Planning permission will be required for any ducts, vents or plant that would materially affect the external appearance of the building. It cannot be assumed that ductwork will be permitted on the exterior of the building.
- 10 You are requested to notify the Chief Planning Officer on commencement of the development in order that the works can be inspected and monitored.
- 11 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.
- 12 This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.
- 13 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 14 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as ground

landlords; and the work must not be instituted until the consent of the City of London Corporation as freeholders has been obtained.

- 15 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
- 16 Consent may be needed from the City Corporation for the display of advertisements on site during construction works. The display of an advertisement without consent is an offence. The City's policy is to restrain advertisements in terms of size, location, materials and illumination in order to safeguard the City's environment. In particular, banners at a high level on buildings or scaffolding are not normally acceptable. The Built Environment (Development Division) should be consulted on the requirement for Express Consent under the Town & Country Planning (Display of Advertisements) (England) Regulations 2007.
- 17 The Developer is recommended to assess and mitigate the possible effects of noise and vibration arising from the operation of the Elizabeth line.
- 18 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.
- 19 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

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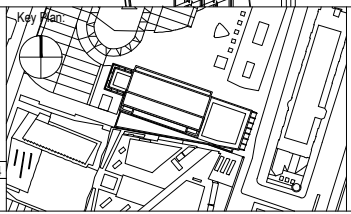


PROPOSED PERMISSIVE PATH (City Plan 2015)

| | | |
|--|----------------------------|-----------------------------------|
| | Existing permissive path | |
| | Additional permissive path | 156.9 m ² (1,689 sqft) |
| | Removed permissive path | 126.6 m ² (1,362 sqft) |

SCALE 1:1000

| No. | Reason For Issue | Date |
|-----|----------------------------|-----------------|
| - | Additional Permissive Path | 09 October 2024 |



Client:
Metropolitan Properties (City) Ltd

Project:
Tenter House
London EC2Y

Architect:
David Walker Architects
39 Great Portland Street
London W1W 7JZ
T: 020 7631 0523
F: 020 7631 0526
info@dwarchitects.co.uk

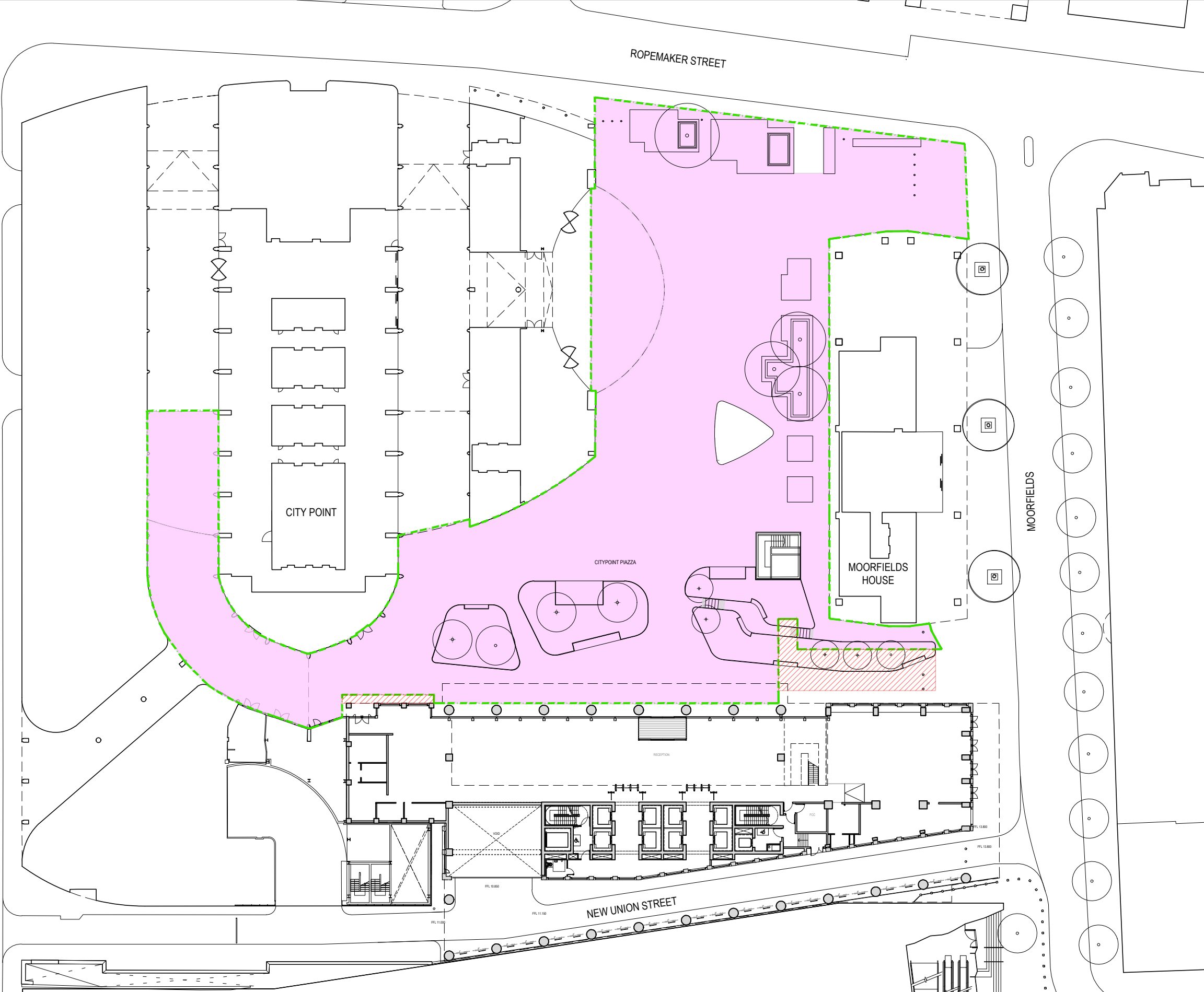
Title:
Proposed Permissive Path
1:500 (A3)

Drawing Status:




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|----------------------------|-------------------------------|-----------|
| Project No: 1094 | Drawing No: SK_1177 | Revision: |
|----------------------------|-------------------------------|-----------|

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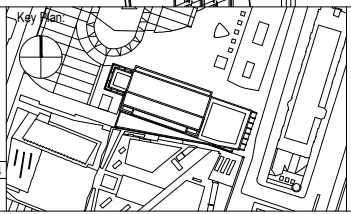


PROPOSED OPEN SPACE AREA OCTOBER 2024

| | | |
|---|-------------------------------------|--|
|  | Reconfigured Open Space Area - 2017 | |
|  | Open space | 3,455.1 m ² (37,191 sqft) |
|  | Potential additional open space | 124.5 m ² (1,340 sqft) |
| | Total | 3,579.6 m² (38,530 sqft) |

DATE: 10/10/24

| No. | Reason For Issue | Date |
|-----|------------------|-----------------|
| - | Open Space Plan | 09 October 2024 |



Client:
Metropolitan Properties (City) Ltd

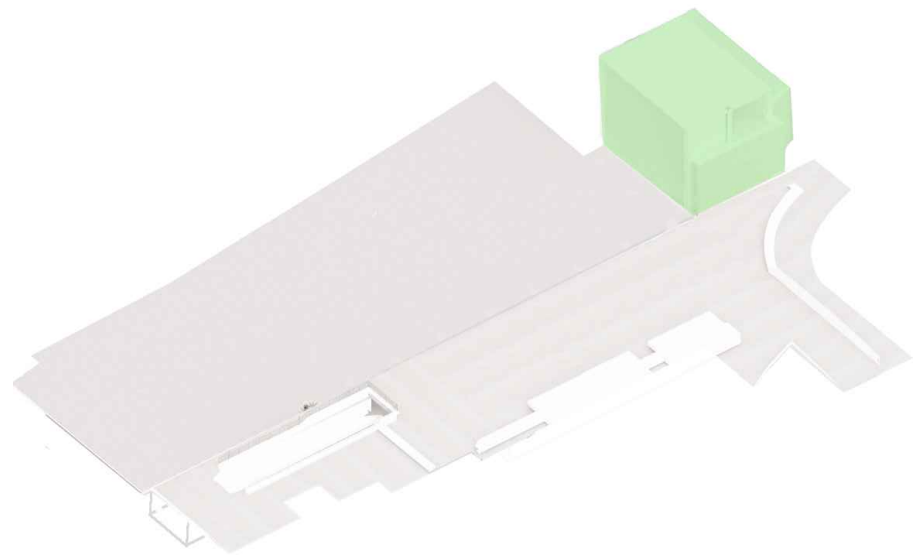
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London EC2Y

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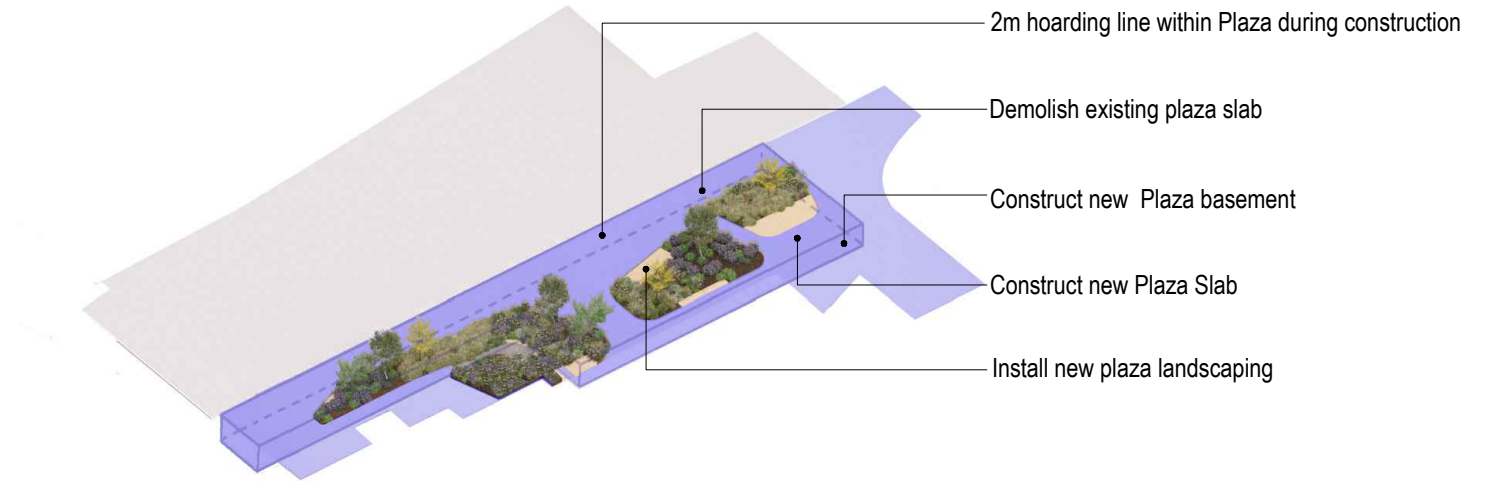
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|--------------------------------------|-------------------------------|-----------|
| Title: Proposed Open Space | | Revision: |
| 1:500 (A3) | | |
| Drawing Status: | | |
| Project No: 1094 | Drawing No: SK_1178 | |

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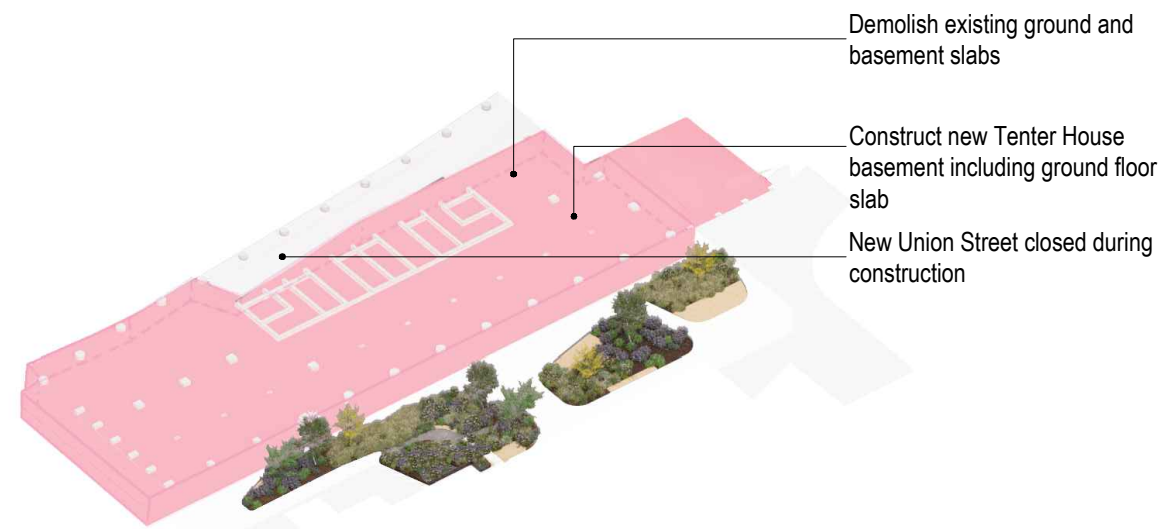
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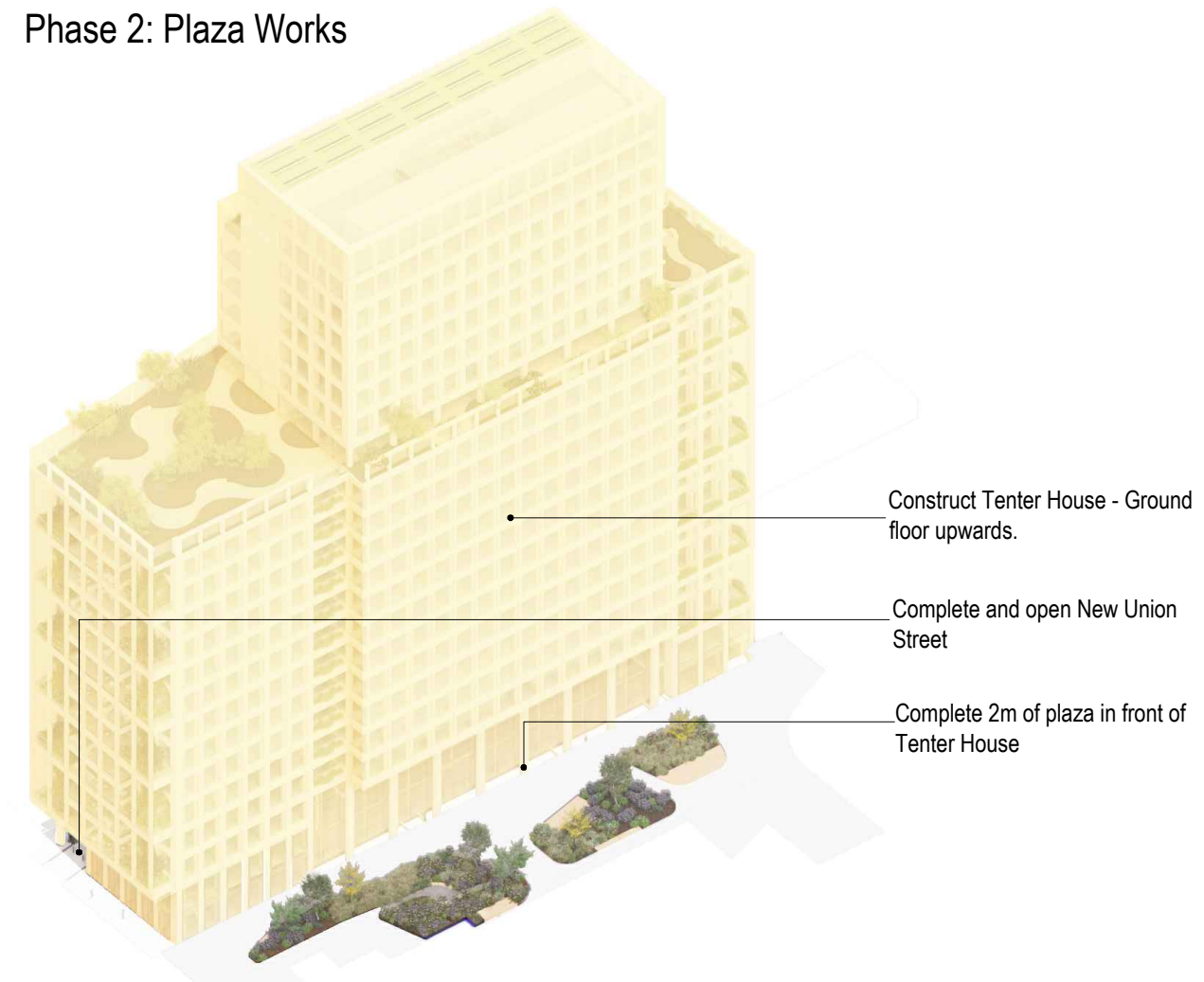
Phase 1: Demolition of existing building down to slab level



Phase 2: Plaza Works



Phase 3: Tenter House Basement



Phase 4: Construction

| | | | | | |
|--|--|--|--|---|--|
| <p>Client: Metropolitan Properties (City) Ltd</p> <p>Project: Tenter House London EC2Y</p> | | <p>Architect: David Walker Architects 39 Great Portland Street London W1W 7JZ T 020 7631 0523 F 020 7631 0526 info@dwarchitects.co.uk</p> | | <p>Title: Phasing Diagrams</p> <p>Drawing Status: FIO</p> | |
| <p>Project No: 1094</p> | | <p>Drawing No: SK-1100</p> | | <p>Revision:</p> | |
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| No. | Reason For Issue | Date |
|-----|------------------|----------|
| - | | May 2024 |



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Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mr Michael Melnick

Address: Flat 3401, 5 Moor Lane, London EC2Y 9BB

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: Existing structure is dated and ugly. I support its replacement on the assumption some attractive landscaping will be provided to complement the new structure.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

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|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mr Jan-Marc Petroschka

Address: 349 Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Residential Amenity

Comment: To facilitate the reading of the analysis, and as good practice requires, could one please request for the Daylight, Sunlight and Overshadowing Report to include the visual depiction of the Transient Shadow Results, on 20 March, 20 June and 21 December - on an hourly basis. The analysis should show the the pre-existing condition and the proposed condition, and further consider the cumulative impact of Tenter House and 21 Moorfields on the residential properties to the west of the site.

From:
To:
Subject: RE: Tenter House 45 Moorfields London EC2Y 9AE
Date: 26 April 2024 13:00:48

THIS IS AN EXTERNAL EMAIL

Dear Environment Department, City of London,

RE: Your ref 24/00209/FULMAJ

I am writing to say, as I have done on all the previous occasions that you have asked for “comments” which you assiduously ignore, that I am absolutely opposed to the proposal to demolish an 11 storey building in order to replace it with a new 14 storey building.

I am going to continue to be opposed to the growing number of identical proposals to demolish and replace any buildings unless the building in question is uninhabitable and cannot be revamped for changed use without demolition. I seriously doubt that will be the case most, if not all, of the time.

My reasons are as follows:

1. The City pretends to be committed to green policies and yet constantly ignores them the minute you sniff money, and you seek to violate them on what seems an almost weekly basis. The 20th century is over. All life on this planet is at risk of dying as a result of environmental destruction and pollution. You must stop for the sake of a future. Take off your blinders.
2. Demolition involves noise pollution, tons of unrecyclable garbage and destroyed building materials as the endless contribution to pollution of the planet, dust and air pollution, pollution by endless numbers of trucks and other vehicles to carry away rubble, clear the area, bring in new building materials and repeat all these problems while rebuilding. As I have experienced daily, e.g. from across the street from Willoughby House, for years now. Years and years.
3. In the case of the street in which you propose this increase in pollution, there is already a very strong wind tunnel, which developed from the growing number of too high buildings that you have allowed to be built there. Sometimes it is really difficult even to walk there. Building works that create a wind tunnel are, as I understand it, illegal. I repeat, illegal. For this reason alone you should be stopped from going forward with this proposal.

The fact is, you have no acceptable answers for these, only the undemocratic power to ignore them.

I sincerely hope you will find something more of value to the community to spend your time on, instead of turning the City into another Canary Wharf, a place that fewer and fewer rich skyscraper occupiers wish to work in, and whose negative aspects should be acknowledged and avoided like the plague.

Kind regards,
M Berer
114 Speed House
Barbican
London EC2Y 8AU

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mr Tim Bishop

Address: 84 Speed House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: There is too much empty office space in this area - with new buildings on Ropemaker Street - new offices at the Broadgate site and proposals for the old Linklaters site on Silk Steet.

This new building will create more traffic - pedestrian and vehicles on Moor lane - already subject to more traffic due to the Deutsche Bank.

The building process will be disruptive - as was Deutsche Bank. The access routes include under my bedroom on Silk Street - a narrow street. This will create a noise and traffic problem.

The size of the building will mean it is visible from my living room. Already I am being boxed in with new buildings on London wall and proposals the Museum of London site.

Finally there is the whole issue of re-use and refurbishment and carbon footprint. Other

neighbouring areas e.g. Westminster are taking re-use seriously in order to lower carbon foot print.
When will the City take carbon and global warming seriously ?

Comments for Planning Application 24/00209/FULMAJ

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Case Officer: Amy Williams

Customer Details

Name: Mr Nigel Gilbert

Address: 314 Gilbert House Barbican Lpndon

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Aside from the apparent lack of any kind of sympathetic integration with the architecture of the surrounding buildings, the additional height proposed will block sunlight to both of the west facing residential blocks in the Barbican (Willoughby and Gilbert House) plus increase the risk of elevated light pollution at night. In addition, servicing a building with approximately double the capacity of the existing structure will place a significant additional strain on the transport and communications infrastructure serving the City Point area and potentially increase the level of noise pollution.

Comments for Planning Application 24/00209/FULMAJ

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Case Officer: Amy Williams

Customer Details

Name: Ms Gabrielle Oliver

Address: 308 Willoughby House Barbican City of London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment:I object because of LOSS OF LIGHT.

Twenty two stories on the side closest to Willoughby House will block the small piece of sky I see from my bedroom.

Is it possible for the plans to be altered so that the 14 storey part of the building is on the Barbican side and the taller part is on the Moorgate side of the building. This would make it possible for me to still see some sky?

Noise will be a nuisance but my main objection is LOSS OF LIGHT.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

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Case Officer: Amy Williams

Customer Details

Name: Mrs Vivien Fowle

Address: Flat 102 Gilbert House, Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:I have several objections to this planning application:

(1) The existing building is 11 storeys high , the current approved scheme is 18 storeys and now the new proposal is for 22 storeys.

(2) The new proposed building would be half way in height on the east skyline between City Point and 21 Moorfields

(3) This would result in a loss of sky and direct sunlight and the impact on Gilbert House residents, the impact of which is not addressed in the planning documents

(4) The lighting strategy says lighting will be turned off or dimmed at night. This is insufficient and automatic blinds should be fitted as light pollution is a significant issue for Barbican residents.

(5) The proposed use of Moor Lane as the service road for the building will significantly increase the number of vehicles on that road - which, once again, will have a severe impact on Barbican residents.

Once again, the planning committee should take into account the impact on residents and not just aim for commercial gain. Residents and business should accommodate each other and this scheme runs roughshod over residents.

Comments for Planning Application 24/00209/FULMAJ

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Case Officer: Amy Williams

Customer Details

Name: Ms Sheelagh McManus

Address: flat 518 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:I am writing to object to the current proposals described in the supporting document : "Delivery, Servicing and Waste Management Plan", dated February 2024. My partner and I live in Willoughby House. Our bedroom windows face onto Moor Lane, and we are located directly opposite the junction of New Union Street and Moor Lane.

We are objecting on the grounds of Noise and Disturbance. The latest planning application proposes that all vehicular servicing will access the development via Moor Lane and New Union street (with egress onto Moorfields), on a one-way basis. It estimates 88 deliveries per day (with the increased size of the latest planning application accounting for an increase of 20 per day). This means that all of these additional deliveries will be routed directly past the bedroom windows of the 145 flats in Willoughby House, along Moor Lane.

Given this setting, we are particularly alarmed by the statement (Para 7.6), which proposes "...deliveries being undertaken before 6:30am and after 10pm to ease the number of deliveries during the peak daytime hours"

Moor Lane is currently subject to traffic management procedures, with the road closed to the south between 11pm and 7am M-F, plus all-day S+S, in recognition of the residential location. How can it then be appropriate to encourage commercial traffic to Tenter House during these hours?

We strongly urge you to consider the following amendments / conditions to any approval :

- All access and egress is 2-way, via Moorfields (at least for larger vehicles and early morning /late evening traffic)
- Redesign of the delivery area to include an in-out route that avoids the need to reverse (and the resultant high-pitched bleeping noises).
- Any vehicular access via Moor Lane to use smaller / quieter vehicles only (electrically powered, cycles etc)
- Robust conditions to ensure that any approved management strategies are enforceable, designed in from the outset, and not reliant on employment of on-site management staff

Comments for Planning Application 24/00209/FULMAJ

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Case Officer: Amy Williams

Customer Details

Name: Dr Michael Swash

Address: 106 Willoughby house Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: There'll be an increase in vehicular traffic involving Moor Lane, as well as bicycles and the like, that will increase the level of hazard for pedestrians and of course residents.

The increased height of the new proposal means the building will be physically overwhelming - taller than all other local buildings. This will lead to light pollution since it is customary that commercial city buildings ALWAYS leave their internal lights blazing 24 hours/7 days, despite out entreaties that they turn them off out of business hours.

There will be loss of amenity for residents, since the new building is very close to 100% residential buildings - people will look down onto our bedrooms.

Sunlight enters our homes in the early morning and during the day - this will be significantly curtailed: this restriction will not be "insignificant" as claimed in the application documents. Further, the loss of light is NOT to be explained by "overhang on the Barbican balconies". That's a made-up fiction which betrays lack of understanding of life in the City of London.

There is no convincing work-up of deliveries and waste disposal traffic - both are likely to b

significantly increased.

The Barbican estate was not intended to be closely surrounded by tall commercial buildings, encroaching on light and amenities. The new build should be reduced in height .

I attach a photograph showing our current enjoyment of early morning sunlight

/Users/mikeswash/Pictures/Photos Library.photoslibrary/resources/derivatives/3/35669642-5DD4-4EAD-A54D-81E3253F2DDC_1_105_c.jpeg

Comments for Planning Application 24/00209/FULMAJ

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Case Officer: Amy Williams

Customer Details

Name: Guillaume Faucompre

Address: 327 Willoughby House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I participated to the public exhibition in November 2023 where I raised my concerns in writing about the height of the proposal (at the time 7 stories more than the existing building).

I received recently a thank you note from Freshwater in which they stated: "The feedback given by you, and many other local residents and businesses, has helped shape the final details of the plans"

I asked specifically what those details were and received a STATEMENT OF COMMUNITY INVOLVEMENT document in which my concerns about height (as well as noise and sustainability issues) are noted as shared by other people.

But I also realised to my astonishment in this document that the total height of the proposal has been increased by another 4 stories (22 total).

What is the point of public feedback if they are here to be taken, ripped up and completely ignored.

It almost feels like those 4 stories have been added only to spite the people who have raised concern.

The only window of clear sky available from my bedrooms were in between Citypoint and 21Moorfields. And this proposal is getting rid of this altogether to render the view completely artificial.

Moreover, any proposal that pretends to be more sustainable when it actually involves the destruction of existing buildings instead of refitting is just pure greenwashing.

So I can only object to this proposal that again ignores affected residents concerns. Some people on the planning committee might see this comment as nimbyism, I prefer to see it as niabyism (not in anyone's backyard).

Comments for Planning Application 24/00209/FULMAJ

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Case Officer: Amy Williams

Customer Details

Name: Dr Lucy Pollard

Address: 303 Gilbert House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This development will take a great deal of light from my East-facing flat in Gilbert House. This is unacceptable to me, my household and my neighbours. I strongly object.

From: 
To: 
Subject: 24/00209FULMAJ-tenter house
Date: 05 May 2024 15:37:03

THIS IS AN EXTERNAL EMAIL

I wish to comment on the latest planning application re the above .

I am a leaseholder at 516 Willoughby House Barbican, Moor Lane .

I am extremely concerned that the proposed terrace will intrude into the privacy of my bedroom, at the very least if consent for this is given , then conditions should be in place re access, not before 10 am and after 6pm, and never at weekends and bank holidays . There is also a need to respect privacy and light pollution at night by the installation of automatic blinds .

The new proposed height of the building means I shall loose day light and sun light in both my bed room and balcony where I grow a number of plants to benefit the environment, in addition the new height will make our local environment a city of towers , not to be enjoyed by visitors to our historic city ,and will affect iconic views of St Paul's from the river.

The servicing of this new proposal, both in terms of possible demolition, rebuilding and servicing new tenants needs careful consideration.Moor lane is not designed to receive additional traffic, it is a cycle way and already receives traffic from deuche bank

Susan Gilbert

Sent from my iPhone

Comments for Planning Application 24/00209/FULMAJ

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Case Officer: Amy Williams

Customer Details

Name: Dr Barbara MG CORLEY

Address: Flat 208, Gilbert House, Barbican Estate, London EC2Y8BD LONDON EC2Y8BD

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:Objections are made here to the raising of the proposed new Tenter House by a further 4 storeys to double its present height whilst in close proximity to a dense residential area.

Objections are:

1. Light Pollution and Light Spill will affect adversely nearby Barbican East facing flats. Dimming and unenforced Curfew are insufficient mitigation. Automatic shuttering may be a partial solution. At present office lights shine out intrusively at night from blocks adjacent to the proposed Tenter House and any increase will have a very adverse impact on some nearby homes.

[References: Townscape Heritage and Visual Impact -pages 60-67: and Lighting Strategy pages 1 and 19.]

2. Loss of Daylight and Sunlight by nearby residential flats [Reference: Daylight, Sunlight and Overshadowing Report, especially Daylight Analysis - Existing v. Proposed dated Nov. 2023

pages 118-132] There will be loss of light for some longstanding residential East facing flats. ANY loss of light to any individual home will have a serious impact and Good Practice by a responsible developer will surely take account of that.

3. Potential Increase in traffic Noise and Air Pollution in and around the narrow street of Moor Lane arising from the servicing of two ground level retail outlets.

Thank you.

I write on behalf of the Willoughby House Group to object to the planning application for Tenter House on a number of issues.

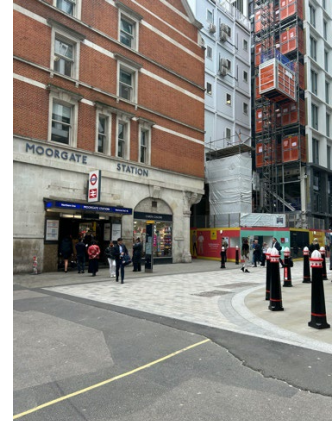
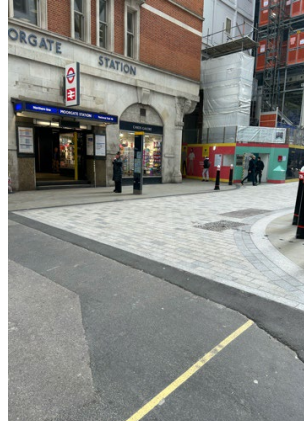
The reason for each issue is residential amenity. The objections are summarised below and for each there is a solution, as described in the text.

1. The access route to the service yard for all vehicles from any direction is proposed to be from Moor Lane despite the fact that all Tenter House vehicles have previously accessed from Moorfields
2. The service yard is not large enough for vehicles to turn around so that the beepers on all vehicles reversing out will cause a noise nuisance
3. Light spillage from 22 storeys into the bedrooms of 145 flats of Willoughby House needs a planning condition to fit automated blinds on the west facing windows
4. 60 sqm of terracing on 12 floors and a large terrace on the 14th floor can cause a noise nuisance and needs a planning condition to close the west facing terraces at 6pm and at weekends
5. **The waste strategy is not clear**
6. There will be light loss for some flats and the cumulative effect of the extra floors will be significant.

The solutions to these issues are detailed below:-

1. **ACCESS ROUTE** from Moor Lane into New Union Street
There is no reason that access to the service yard cannot be from Moorfields as it has always been for Tenter House.
During discussions on the demolition traffic, we were told that the CoL Traffic Department's view was that the footfall at the Moorfields entrance was too large. This is clearly not the case as these photos show the New Union Street/Moorfields junction at various times during the morning and afternoon on a mid-week Wednesday. The extra 4 storeys increase the office space, this in turn generates an extra 20 deliveries a day, taking it to 88 vehicles every day accessing the service yard. Moor Lane is a priority street for a greening project that has been on hold for some years. It is also in the Healthy Streets initiative which is being decided over the next few months.

All vehicles should access the service yard from Moorfields



2. SIZE OF SERVICE YARD

In the consultation on London Wall Place and 21 Moorfields we managed to get the service yards enlarged. The vehicles can drive in and turn round within the space. This avoids the noise nuisance of reversing beepers (white noise is advisory and not mandatory in CoL guidelines). There is no need to reverse.

The service yard for Tenter House should be enlarged as it was in LWP and 21M then all vehicles can access New Union Street from Moorfields and turn round into the service yard then drive out forwards to Moorfields. This is a solution that with

some tweaks to the design will make a huge difference to the lives of all the residents of Willoughby House. It has worked at 21M and LWP.

3. LIGHT SPILLAGE

Policy DM 15.7 of the London Plan states '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...**

We know from experience that lights are left on 24/7, despite automated lighting systems, even at Christmas when no-one is in the offices, blinds are the only thing that work. The CoL planning guidelines recommend the fitting of automatic blinds to windows that overlook residential properties. Unfortunately, it is not mandatory but where the residents have negotiated with Schrodgers at LWP this has made a huge difference to the well-being of the neighbours.

We know that fitting automated blinds at the fit out stage does not work, there needs to be **a strict planning condition to fit automated blinds to west facing windows** now.

4. TERRACES AND BALCONY

Noise nuisance from the use of terraces has been significant for us on Moor Lane and there has been a precedent set for them to be closed in the evening and at weekends. Indeed, we notice that the CoL application for London Wall West had a condition that terraces be closed at 6pm and at weekends. We ask for the same, **a condition that terraces are closed at 6pm and at weekends.**

5. WASTE STRATEGY

The strategy states in 4.3 that waste will be stored on the lower ground adjacent to the servicing yard, although 4.2 states that refuse bins will be stored to the rear of the servicing yard. The noise disturbance from throwing waste into bins and for compactors carries a long way, especially if it is along the narrow New Union Street. **A planning condition is needed to require waste bins, compactors etc to be stored inside the servicing yard and for delivery/collection of waste to be contained within the building**

6. LOSS OF SUNLIGHT AND DAYLIGHT

There is a cumulative effect of the loss of light. Residents have taken photographs of the sunlight they gain in the morning over tenter House. The analysis for this planning application should at the very least give **the analysis showing the change from the present 11 storey building** to the proposed 22 storey building so that those affected can make representations.

Helen Kay
Willoughby House Group
Barbican

Comments for Planning Application 24/00209/FULMAJ

Application Summary

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Case Officer: Amy Williams

Customer Details

Name: Bernard Hughes

Address: 107 Willoughby House Moor Lane London

Comment Details


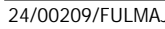
Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity
- Traffic or Highways

Comment: The amended proposal is excessively high and far too dense for a small square (CityPoint) and will overshadow hundreds of bedrooms on Moor Lane obliterating morning sunlight and amenity for residents. A west facing terrace overlooking our bedrooms cannot be right and is unnecessary and in any circumstance must have considerable greening to maintain privacy and safety by keeping people away from the west edge. Under no circumstances should the part of the terrace facing residents be used for entertaining or after 5pm and certainly not at weekends. The tower is just too tall and dense and all additional servicing will create more highway issues and amenity loss. The scheme is too big for such a dense area.

From: 
To: 
Subject: 24/00209/FULMAJ
Date: 06 May 2024 09:29:11

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

I am writing to object to the above application.

It is stated wrongly that the reduction in light is caused by very deep overhanging projections above the windows of Willoughby House. There are no such projections on the top floor. Loss of 13% of light is a considerable loss to anyone, on whatever floor they may be living. Indeed, If these overhangs are so light-depriving, it is surely wrong to deprive them of even more. For twenty years, Willoughby House has gradually and inexorably been the victim of light loss, from City Point and 23 Moorfields and other developments. The one sliver of light we benefit from is currently the gap between the two mentioned buildings. The blunt fact is the new development will obstruct this substantially. As I understand it, more detailed information on this has been requested by WHG but at the time of writing - the day before the deadline - this has not been provided.

Moor Lane is already burdened with a plethora of access vehicles servicing City Point and 23 Moorfields. This street was intended to be part of a greening project by COL. Instead, we have the prospect of yet more access vehicles servicing Tenter House.

Has anyone researched how much office space in the City is unused?
Has anyone asked whether we actually need yet more retail outlets?

It was said at the planning meeting for LWW, "This isn't Dorset" - the comment was designed to impress on residents the fact that we must live cheek by jowl, as London has done "since Roman times". Today, we have a choice. We can either go on and on developing unnecessary and polluting building projects, or we can work towards net zero and a more humane way of living.

Yours faithfully
James Y Watson
513 Willoughby House
Barbican
EC2Y 8BN

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mr Scott Palmer

Address: Flat 102, Willoughby House Barbican London

Comment Details


Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: The plan for service vehicles to access the site from Moor Lane is unacceptable. It is a residential street. There will be excessive traffic on other residential streets around the Barbican. Residents have been subject to building noise for more than ten years. 21 Moorfields is just finishing and The Heron and The Guildhall School were finished in 2014 after many years of construction. This is a constant menace to residents.

From: 
To: [PLN - Comments](#)
Subject: Objection to Application 24/00209/FULMAJ - Tenter House
Date: 06 May 2024 13:04:27

THIS IS AN EXTERNAL EMAIL

Dear City of London Planning,


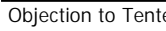
I am writing to object to the planning application named in the subject line. Importantly, I'm objecting on the grounds that:

- demolition of Tenter House would contradict carbon policies, and reuse of the space should be thoroughly considered before demolition.
- Terraces will directly overlook residential properties, leading to a loss of amenity and a further encroachment on our personal and private spaces, without proper assessment of the risks.
- There must be a planning condition that stipulates west facing windows (i.e. those overlooking residential areas) to have automated blinds to control light spillage. As seen with other recent developments, such as 21 Moorfields, this should be a condition earlier in the process.
- The service yard is not big enough for vehicles to turn round, and vehicles will reverse in/out using beepers. Given experiences from construction of 21 Moorfields, white noise beepers should be a condition.
- Tenter House is not serviced from Moor Lane. New Union Street would be overrun with delivery trucks, adding to the disruption to residents.

Please confirm receipt of this objection.

Many thanks,

Nina Barber
538 Willoughby House, EC2Y 8BN

From: 
To: 
Subject: Objection to Tenter House planning application 24/00209
Date: 06 May 2024 15:49:40

THIS IS AN EXTERNAL EMAIL

Dear Planning at City of London,

I am writing to object to the planning application for a 22 storey building replacing Tenter House.

My concerns are :

1. The primary concern is the noise pollution. Already I find it hard to understand why the main loading bay to the new Deutsch bank building was put adjacent to the bedrooms of residents, when access with more careful consideration and planning could have been arranged from Moor Lane. To compound this with yet more traffic disturbance to Tenter House that is currently not served by Moor Lane will make noise pollution unbearable, and though I don't have readings to demonstrate it, I expect the intermittent noise pollution will exceed permitted levels. This morning I was woken by the sound of a vehicle reversing out of 21 Moorfields / Deutsch Bank, the loud beeping would wake anyone. Vehicles must not be allowed to reverse out of Tenter House.
2. Heritage is another major consideration. Tenter House with careful refurbishment would be turned into a modern building that compliments the neighbouring Barbican estate.
3. Carbon emissions—refurbishment will considerably lower the damage to the climate from emissions plus the new material impact that will ensue with a new build. Why on the one hand the Corporation tinkers at the edges with the Heart of the City climate campaign and on the other hand allows extensive and unnecessary development on the other makes no sense. Paying lip-service to the problem won't cool us down.

The developers need consider:

1. Installing and paying for double glazing in all flats to lessen the noise.
2. Installing blackout blinds across the whole Tenter House development to prevent light pollution, though given the Heart of the City's Climate campaign, I'd sooner see buildings issued with fines for keeping lights and heating on unnecessarily overnight.
3. I will lose a considerable amount of light in my bedrooms and would like to know why this has not been addressed at the pre-planning stage as it was with 21 Moorfields / Deutsch bank.

I look forward to hearing from you.

Yours sincerely,

Caroline Bennett
527 Willoughby House

Barbican

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].
|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mr Benedict Harris

Address: Flat 317 willoughby house, barbican Willoughby House, Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: Deeply concerned by vehicle access plans, it is essential that traffic is not allowed to access the site from Moor Lane. Moor Lane is not suited for hgv access, acoustics on the street amplify noise in a residential area. Residents have already dealt with significant disruptions from the Moorgate development, Tenter House is likely to be much louder. As a father of 2 under 2 I am deeply concerned about noise disruption that will make our lives unbearable.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].
|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Ms Lila Rawlings

Address: 719 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment:I would like to object to the plans for Tenter House on the following points:

The height of the building is excessive at 22 floors - residents at the Western end of Willoughby (and possibly further along the block) will suffer significant loss of light. This is another building that takes away our quality of life in so many ways that we request the plan to be modified into a reasonable size.


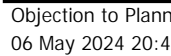
We have lived opposite the building of Deutsche Bank for 6 years and are well aware of the strain that Moor Lane is now under - the noise of service vehicles is already at maximum capacity. The plan to send ALL projected 88 vehicles a day into New Union Street from Moor Lane is unworkable - these are people's bedrooms - children and elderly people are sleeping in the rooms currently directly affected by noise - this is simply untenable.

The service yard is too small for vehicles to turn round, vehicles will reverse in/out using beepers -

these currently begin as early as 6am and as above - have done so for over 6 years. Again this is leading to sleep deprivation and mental health issues for many of the residents.

Light pollution continues to be a issue for all the new buildings on Moor Lane so we would like it to be a planning condition that west facing windows be fitted with automated blinds (and this should be done at the fitting-out stage)

We request planning condition for terraces next to our flats (west facing) to close at 6pm (which the City closing time planning proposal for London Wall West). We have lived with late night noise, drunken people urinating outside our block and worse - and we have fought to keep this a safe and enjoyable place for our community to live. This proposal indicates terraces on floors 2, 4, 6, 8, 10, 12 and a larger one on 14 which we need to be closed by 6pm.

From: 
To: 
Subject: Objection to Planning Proposal Ref : 24/00209/FULMAJ – Tenter House 6/05/2024
Date: 06 May 2024 20:48:55

THIS IS AN EXTERNAL EMAIL

Objection to Planning Proposal Ref : 24/00209/FULMAJ – Tenter House 6/05/2024

Objector: Richard Haynes – long Leaseholder Flat 705 Willoughby House, Barbican

The grounds for my objection are as follows:

1. Deal creep

Planning Approval granted 2017 for 18 story building, was the sixth proposal in 20 years . Why should the Corporation approve another additional height (an additional 4 stories) when the original footprint was/ is 11 stories before Tenter Demolition? This deal creep has DOUBLED the proposed building height. I have been a resident in Willoughby for 30 years and this is another attempt by Corporations not resident in this locale to diminish our quality of life through damaging the local townscape.

2. Layout and density

The layout and density of the development through 22 stories DIRECTLY in front of my bedroom window is another incremental attempt by planners / developers to diminish our quality of life in the following ways:

3. Loss of Light

The Surveyors in the employ of the Developers have stated that there are some minor reductions of light and sunlight to Willoughby which will in their view be unnoticeable due to “deep overhanging projections above the windows”. I disagree . I am aware that this comment notwithstanding –the surveyors have acknowledged to our neighbours on either side of our flat that there has or will be a material loss of light.

4. Overlooking and Loss Of Privacy

The terrace directly overlooking our homes damages residential amenity significantly affecting our valuable privacy. This will be much worse if business / client entertaining access is permitted after normal working hours –the noise effects of chatter is particularly reverberative along Moor Lane as it is. (From the Refinery which is at Street Level);

5. Servicing arrangements potentially dangerous

This is particularly an issue as it is inappropriate for a Residential area- there are residents with children whose bedrooms face onto Moor Lane and the continuing sound of Lorry reversing alarms is already routinely disturbing our children. There is no need for servicing access to be granted

We were previously promised that this would be an access road with Trees !

6. Light Pollution at Night

In order for residents to minimise this we would ask for offices facing Willoughby House to be blacked out automatically at dusk.

Richard Haynes

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].
|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mr G Dissez

Address: Flat 201, Willoughby House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Traffic or Highways

Comment: There is already a significant loss of light due to the buildings next to Barbican flats on Moor Lane. After approving a 21 storey tower it's shocking that permission is now being sought for a 22 storey tower. Developers continually create new proposals and amend existing ones seeking to push the bounds of what was previously agreed. Each individual proposal is positioned as a small loss of light, a small increase in traffic, a bit more noise but the cumulative effect is hugely detrimental to residents. The main elements we oppose to are:

- The increase in noise on Moor Lane, there are already a very large number of deliveries including early in the mornings and on weekends with trucks reversing and beeping throughout the day. Moor Lane should not be used for servicing any new development either during construction or once complete, there are alternative options such as Moorfields and New Union Street that are far less disruptive to residents.
- The proposed tower is very tall and many residents will face significant loss of light. Terraces directly overlook homes and there will be a significant increase in light pollution which is already a real problem with existing developments such as City Point.

- The City of London claims it has a "radical Climate Action Strategy", one of the most obvious ways to help the climate is to reuse and repurpose existing buildings rather than knocking them down and starting again. Any green measures such as solar panels have a negligible impact when compared to the embodied carbon in a new development. Why is a new building needed?

As the City of London aims to position itself as more than just an area filled with offices with schemes such as "Culture Mile" I would hope that they start to take their residents into greater consideration. If the CoL aims to have a more diverse set of occupiers as the demand for office space drops it should place greater emphasis on the needs of residents rather than just pandering to businesses.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].
|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mr Petre Reid

Address: 524 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I object for the following reasons:

Traffic and Resulting Noise.

Currently Tenter House is not serviced from Moor Lane. This should remain. The proposal is for this to change with upwards of 80+ vehicles a day using Moor Lane to access the proposed new site. In addition, as there has been no plans to enlarge the service area to allow vehicles to turn around, these vehicles will thus have to reverse back into Moor Lane. The Willoughby block, which is residential, looks down on Moor Lane and those rooms that face Moor Lane (and thus Tenter House) are, in the main, bedrooms. The increase in vehicle movement within Moor Lane is already causing distress to residents of Willoughby; how much more distress will be caused if this proposal is approved.

Right to Light

The proposal calls for a 22 storey high building. With such a tall building within such close proximity to Willoughby House it is inevitable residents will be impacted by a decrease in their light.

Light Pollution

The planning approval must require automated blinds. Residents do not want to be kept awake looking at burning lights.

Noise from proposed terraces/balconies. The proposal calls for a number of terraces and balconies which will overlook the residents of Willoughby House. At best these terraces and balconies should be removed. At worst, restrictions should be placed on their usage, for example no use after 6pm on weekdays and no use during weekends.

To whom it may concern,

Please find an objection to the below referenced planning application.

| | |
|------------------|--|
| Reference | 24/00209/FULMAJ |
| Address | Tenter House, 45 Moorfields, London, EC2Y 9AE |
| Proposal | Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development). |

I am the leaseholder of 601 Willoughby House, a neighbouring residential property directly impacted by this application.

The grounds and details of the objection are as follows:

Residential Amenity: Impact of Loss of Light to Residential Dwellings (Willoughby House)

The 2020 Permission extends to 87.9m AOD, whilst the 2024 Proposal extends to 99.9m - twelve metres higher.

The detrimental impact of this height increase on daylight to Willoughby House, including my own flat, is significant.

The table below uses data from the application to illustrate this. It compares NSL 'lit areas' between the baseline 2020 Permission and the 2024 Proposal.

As a means of illustrating the difference in impact between the two schemes, the data for 'Room 35' is shown for each floor. I understand that Room 35 on the 6th Floor falls within my property.

| | 2020 Permission / NSL sq ft | 2024 Proposal / NSL sq ft | Reduction in NSL |
|---------------------------|--|--------------------------------------|-------------------------|
| Room 35, 1st Floor | 52.4 | 41.2 | 21.4% |
| Room 35, 2nd Floor | 56.8 | 43.7 | 23.1% |
| Room 35, 3rd Floor | 61.0 | 47.2 | 22.6% |
| Room 35, 4th Floor | 68.0 | 54.0 | 20.6% |
| Room 35, 5th Floor | 72.4 | 56.4 | 22.1% |
| Room 35, 6th Floor | 76.1 | 62.1 | 18.4% |

In the case of the 1st floor room, the 2024 Proposal takes the NSL to just under 30% of the room's area. In similar vein, the room on the 2nd floor sees a reduction of 45% in VSC. All rooms considered see a substantial reduction in both NSL and VSC.

The data simply does not support the applicant's statement '*that the Proposed Development would not cause a material additional impact to the surrounding amenity in terms of daylight, sunlight and overshadowing*'.

Given the material negative impact evidenced by the applicant's own data, allowing the 12m increase in height would seem inconsistent with the the City of London Local Plan policy statement '*to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels ...*'.

The proposed 2040 City Plan further notes '*The amount of daylight and sunlight received has an important effect on the amenity of dwellings... Access to appropriate levels of daylight and sunlight is important for the mental health of workers and residents.*'

Noise / Traffic & Highways: Impact of Increased Service Traffic to Residential Dwellings (Willoughby House and 5 Moor Lane)

The scheme envisages a large amount of service traffic entering the proposed building via Moor Lane.

The increased traffic will cause inevitable loss of amenity due to noise impact to the residential dwellings in Willoughby House and 5 Moor Lane, including my own. This will be amplified by the canyon effect, given the road is already bordered by tall buildings. There is also risk of noise impact to the same dwellings if vehicles are not given space to turn within the proposed building and are expected to reverse out on to New Union Street.

Furthermore, increased traffic if routed from the north, may create conflict / increased hazard to pedestrians crossing Moor Lane on the natural route from Moorgate Station to the Barbican Arts Centre, as well as for the many cycle commuters who use the route.

Finally, routing traffic along Moor Lane seems to oppose the spirit of the City of London's previous proposals '*to create greener, biodiverse and environmentally resilient Moor Lane*'.

Having service traffic enter and exit the building from Moorfields, turning within space provided in the building, seems as though it would address all of these concerns.

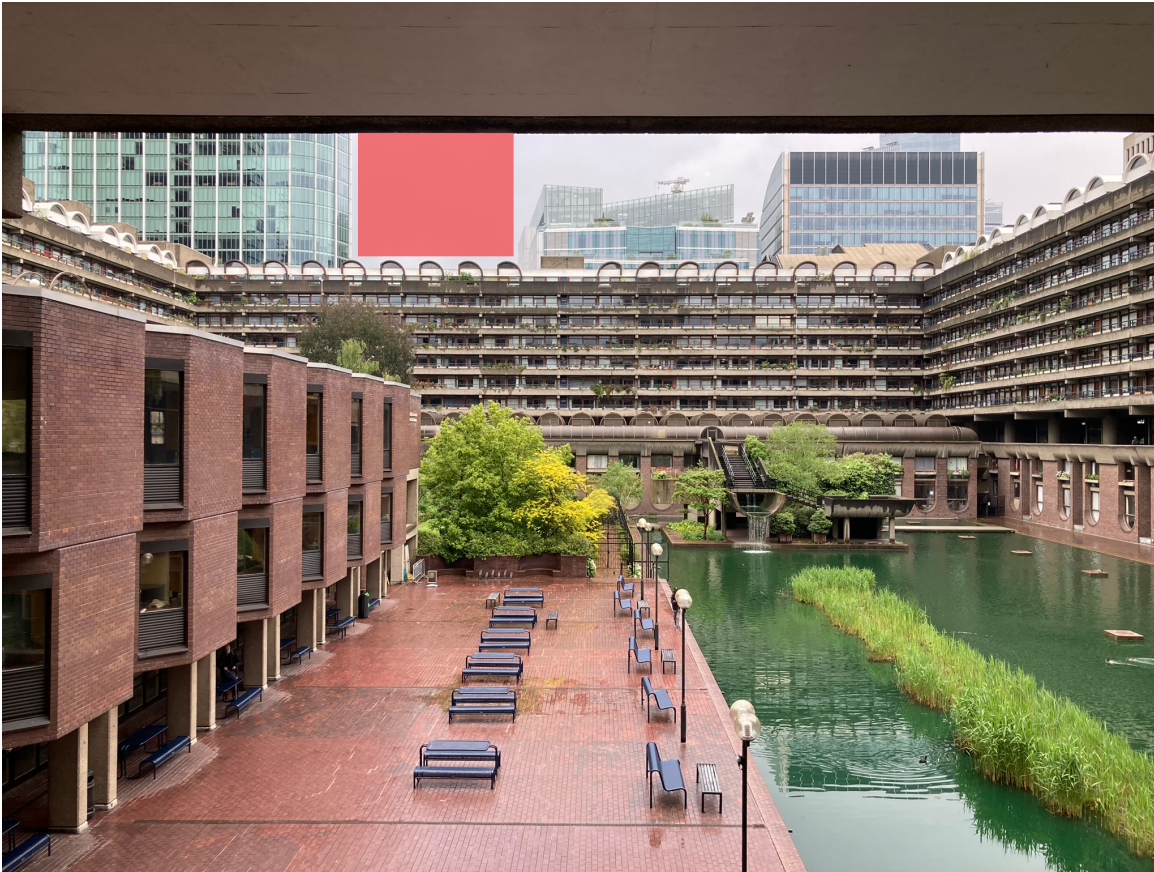
Other: Negative impact on the setting of the Barbican Conservation Area and Listed Buildings

The Barbican Estate Listed Building Management Guidelines¹ state:

1.5.4 Grandeur. The sheer extent, volume and richness of space, land and water, especially as viewed in both directions from the vantage point of Gilbert Bridge makes it unique in the City of London. Whilst it is differentiated in landscape treatment in numerous ways and thereby is actually experienced as a series of linked 'sub-zones', it is of paramount importance that the overall sense of this space as a single entity is not diminished by any physical intervention or sub-division. Any proposal for alteration would need to be judged against the most stringent criteria imposed by designation.

The photograph below shows the view east from Gilbert Bridge, with the approximate location of the proposed development highlighted in red.

¹ <https://www.cityoflondon.gov.uk/assets/Services-Environment/spd-barbican-estate-listed-building-management-guidelines-volume-IV.pdf>



The photograph demonstrates that whilst the proposed development lies outside the estate, it would diminish the overall sense of space by dramatically impinging on the remaining visible sky. this is in strict opposition to the very strongly worded guidelines.

Other: Environmental Impact of Scheme

The Planning Statement notes:

8.136 The Proposed Development would therefore include a considerably more sustainable building in comparison to the 2020 Permission by considering and reducing both embodied carbon and operational carbon. A range of sustainability measures have been integrated within the approach to the Proposed Development, including through the use of high-performing materials and the provision of renewable technologies.

Whilst I welcome measures to aid sustainability, presumably the building could be made even more sustainable by introducing the same measures within a smaller building, inline with the 2020 Permission.

I note that the application also list other advantages over the 2020 Permission, such as improved public realm, which again could also be achieved with a building of the previously planned height.

Yours faithfully.

Mark McMillan

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Objection to Tenter House planning application 24/00209
Date: 06 May 2024 22:29:48

THIS IS AN EXTERNAL EMAIL

Dear Planning at City of London,

This email is to object to the planning application for another tall building of 22 storey which will replace Tenter House.

My worries are listed below:

1. The main concern is the noise pollution. Already I find it hard to understand why the main loading bay to the new Deutsch bank building was put adjacent to the bedrooms of residents, when access with more careful consideration and planning could have been arranged from Moor Lane. To compound this with yet more traffic disturbance to Tenter House that is currently not served by Moor Lane will make noise pollution unbearable, and though I don't have readings to demonstrate it, I expect the intermittent noise pollution will exceed permitted levels. This morning I was woken by the sound of a vehicle reversing out of 21 Moorfields/Deutsch Bank, the loud beeping coming from the truck/van would wake anyone. Vehicles must not be allowed to reverse out of Tenter House.
2. Heritage is another major consideration. Tenter House with careful refurbishment would be turned into a modern building that compliments the neighbouring Barbican estate.
3. Carbon emissions– refurbishment will considerably lower the damage to the climate from emissions plus the new material impact that will ensue with a new build. Why on the one hand, the Corporation tinkers at the edges with the Heart of the City climate campaign and on the other hand allows extensive and unnecessary development on the other, makes no sense. Paying lip-service to the problem won't cool us down.
4. Light pollution, these new buildings have the lights on all night long...that can't be good and it certainly does not match our need to lower our electric output as a city and take off some of the burden from our already struggling power grid which itself need gas... (the whole carbon net zero target is such a paradox??)...

The developers need to consider the following:

1. Installing and paying for double glazing in all flats to lessen the noise.
2. Installing blackout blinds across the whole Tenter House development to prevent light pollution, though given the Heart of the City's Climate campaign, I'd sooner see buildings issued with fines for keeping lights and heating on unnecessarily overnight.
3. I will lose a considerable amount of light in my bedrooms and would like to know why this has not been addressed at the pre-planning stage as it was with 21 Moorfields /

Deutsch bank.

looking forward to hearing from you.

Yours sincerely,

Sami Nkaili

527 Willoughby House

Barbican



Ms Amy Williams
 City of London PO Box 270
 Guildhall
 London EC2P 2EJ



5th May, 2024

Dear Ms Williams,

Objection to planning application 24/00209/FULMAJ for the demolition and building at Tenter House, 45 Moorfields, London, EC2Y 9AE

I object to this development on the grounds of sustainability, massing/overbearing, daylight/sunlight, townscape, inadequate traffic/servicing and damage to amenity for neighbouring residential occupiers. The current application doubled the size of this building. This new application adds four more floors and is too big, too near neighbouring residential, and encroaches too much on strategic views and skylines, without suitable mitigation to make it acceptable. Consultation was only done after the pre-application stage and my comments were not taken into account in the design evolution.

In particular I object to;

- i) The WLCA which excludes the carbon associated with demolition
- ii) The size/scale of the scheme
- iii) Traffic and servicing arrangements
- iv) Loss of daylight and sunlight due to the excessive height of the development.
- v) Noise pollution from the roof terraces.
- vi) Light pollution from artificial lighting at night.

To safeguard amenity under the Local Plan (DM15.7, DM21.3), west-facing terraces overlooking and very near our flats should either be taken out of the scheme or limited by condition to restrict use after 6pm on weekdays, and none at all on weekends and Bank Holidays, as with the London Wall West application which said (condition 41) that: "*The roof terraces hereby permitted shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency*".

Nearly 90 deliveries a day are anticipated to service Tenter House, arriving along the residential street, Moor Lane. This will damage amenity for residents and pose a danger for cyclists using the strategic cycle route on the street. As the servicing yard is not big enough for vehicles to turn around there will also be noisy reversing. This contravenes the City's current plan policy DM 16.5. In the 2020 scheme, the planning department insisted on a servicing yard big enough for lorries to turn round and publicised this particular aspect of the consent. The same should apply to this application.

Conditions should also require blinds to drop automatically at 7pm to stop the high level of light pollution adversely affecting "light-sensitive" homes next to the scheme –in line with the City's Lighting SPD.

Yours sincerely

E Hirst

From:
To:
Subject: RE: Objection to Tenter House planning application 24/00209
Date: 07 May 2024 07:46:54

THIS IS AN EXTERNAL EMAIL

Dear Planning at City of London,

Following on from my objection yesterday, I attach three photos taken this morning clearly demonstrating that the loss of light will be significant.

I trust this will be considered.

Best
Caroline

From: Caroline Bennett
Sent: Monday, May 6, 2024 3:50 PM
To:
Subject: Objection to Tenter House planning application 24/00209

Dear Planning at City of London,

I am writing to object to the planning application for a 22 storey building replacing Tenter House.

My concerns are :

1. The primary concern is the noise pollution. Already I find it hard to understand why the main loading bay to the new Deutsch bank building was put adjacent to the bedrooms of residents, when access with more careful consideration and planning could have been arranged from Moor Lane. To compound this with yet more traffic disturbance to Tenter House that is currently not served by Moor Lane will make noise pollution unbearable, and though I don't have readings to demonstrate it, I expect the intermittent noise pollution will exceed permitted levels. This morning I was woken by the sound of a vehicle reversing out of 21 Morrfileds / Deutsch Bank, the loud beeping would wake anyone. Vehicles must not be allowed to reverse out of Tenter House.
2. Heritage is another major consideration. Tenter House with careful refurbishment would be turned into a modern building that compliments the neighbouring Barbican estate.
3. Carbon emissions– refurbishment will considerably lower the damage to the climate from emissions plus the new material impact that will ensue with a new build. Why on the one hand the Corporation tinkers at the edges with the Heart of the City climate campaign and on the other hand allows extensive and unnecessary development on the other makes no sense. Paying lip-service to the problem won't cool us down.

The developers need consider:

1. Installing and paying for double glazing in all flats to lessen the noise.
2. Installing blackout blinds across the whole Tenter House development to prevent light pollution, though given the Heart of the City's Climate campaign, I'd sooner see buildings issued with fines for keeping lights and heating on unnecessarily overnight.
3. I will lose a considerable amount of light in my bedrooms and would like to know why this has not been addressed at the pre-planning stage as it was with 21 Moorfields / Deutsch bank.

I look forward to hearing from you.

Yours sincerely,

Caroline Bennett
527 Willoughby House
Barbican





From: [REDACTED]
To: [REDACTED]
Subject: [REDACTED]
Date: 10 May 2024 14:14

THIS IS AN EXTERNAL EMAIL.

Full address
Mrs Valerie Mills
120 Willsingby House
EC2L 2BN

Sent from my iPhone

> On 9 May 2024, at 11:00, P.L.N. - Comments <[REDACTED]> wrote

- >
- > Dear Ms. Mills,
- >
- > Many thanks for your comment, which I can confirm has been received.
- >
- > For your comment to be registered, please supply your full address.
- >
- > Kind regards,
- >

> Davis Watson
> Business Administration Approver (Town Planning)

> Environment Department
> City of London Corporation

> City of London Corporation, PO Box 7700, London EC3P 2EJ

> <http://pln.coflondon.gov.uk>

> <http://pln.coflondon.gov.uk>

>

> -----Original Message-----

> From: Valerie Mills <[REDACTED]>

> Sent: Tuesday, 10 May 2024 14:14

> To: P.L.N. - Comments <[REDACTED]>

> Subject: Town Planning

>

> THIS IS AN EXTERNAL EMAIL.

>

> I am most concerned about an increase in the number of vehicles using Moor Lane to service the new Tanker House development.

> Not only traffic noise but traffic pollution. Both harmful to health.

> I live in Willsingby and am concerned about serious health being adversely affected.

> Please be careful and thoughtful neighbour in this close community. Health issues are paramount. Traffic noise and pollution is miserable as we have read about in the press and the negative ties of living near traffic. Please to think on this issue and make life easier.

> Thank you

> Valerie Mills

>

> Sent from my iPhone

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> <http://pln.coflondon.gov.uk>

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From: 
To: [PLN - Comments](#)
Subject: Tenter House Planning Application Objection - 24/00209/FULMAJ
Date: 07 May 2024 08:55:50

THIS IS AN EXTERNAL EMAIL

Dear Planning Team

As a resident of Willoughby House in Barbican I am writing to object about the proposed increase to 22 storeys of the new Tenter House.

This is yet another example of constant encroachment and diminishing of the amenities and rights of enjoyment by residents at Willoughby House.

I am very concerned about the increased traffic the development is going to give rise to as well as the problems it will cause the dedicated cycle route. As I understand it the builder intends to direct all traffic for the development up Union Street - this will cause inordinate difficulties for the residents by reason of the noise (often as experience of 21 Moorfields proves, very early in the morning).

The demolition seems to be contrary to the drive for carbon zero developments. In any event, if permitted to be demolished, the dust the demolition it will generate will mean we will not be able to open our windows, at all. Even with our windows closed our homes have been covered in dust during past demolitions.

The increased height will affect light amenity into our flats. In addition, if windows are permitted at that height they will cause unacceptable light pollution so, any windows at that height will need to be fitted with automated blinds which will have to be pulled down when the lights are on and the lights should be switched off at night (as at Weworks & Schroeders).

The plans seem to show terraces. Events or late opening at terraces are very noisy and disruptive for residents. If they are to be permitted then please ensure they are closed from 6pm every night and closed during public holidays.

There are so many objectionable reasons that a grant of the amendment to 22 storeys would be incomprehensible.

Kind regards,
RR

Ms Rashda Rana SC
521 Willoughby House

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Comment (Objection) on Tenter House Planning Application - 24/00209/FULMAJ
Date: 07 May 2024 10:46:01

THIS IS AN EXTERNAL EMAIL

Good morning

I wish to object on several grounds:-

1. Traffic & Noise. The proposal entails 88 vehicles/day to access the site via New Union Street. This equates to one vehicle every 16 minutes (if operating 24/7) or 1 vehicle every 11 minutes if operating 7am to 11pm. This is inherently unsafe for other vehicles & for pedestrians, since the loading/unloading time would mean vehicles waiting in line in roadways too narrow to accommodate; the turning circle & space available in New Union Street would mean that all trucks would need to reverse, leading to i) noise from reversal beepers ii) high risk of collision.
2. Light. The high-rise nature of the building will have an obvious impact on light for the existing residents of Willoughby House (as has already been documented). There is also no provision/requirement for the completed building to have zero overnight light pollution.
3. Noise/Pollution. There is no attempt at mitigation of noise, air pollution or compromised access during the works.
4. Climate. The Carbon Dioxide generated by CO2 release from demolition of the existing building ("captured carbon") and the construction of the new building is in contravention of UK & City of London climate targets.
5. Financial. There is no evidence provided that the project has any commercial value to the City of London, which already carries surplus office space. It appears, therefore, that the entire project is devised as a means of manipulating CoL tax & construction incentives to the exclusive benefit of the company and its shareholders.

I am emailing because I have been unable to enter this comment on the website in spite of multiple attempts.

Dr Steve Nicholson
Resident (therefore Neighbour or Member of Public)
536 Willoughby House
The Barbican
London EC2Y 8BN

[REDACTED]

From:
To:
Subject: OBJECTION: Your Reference 24/00209/FULMAJ
Date: 07 May 2024 12:16:03

THIS IS AN EXTERNAL EMAIL

Good afternoon

I write as a neighbour to OBJECT to Planning Application Reference 24/00209/FULMAJ - Tenter House, 45 Moorfields, London, EC2Y 9AE

Proposal Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

My OBJECTION is based on the following matters:

Traffic and servicing - the current plan seeks to route deliveries down Moor Lane, which has never been the servicing point for Tenter House and is both a key cycle route, an important pedestrian route and should be a quiet residential street as it is overlooked by hundreds of bedrooms in Willoughby House.

I am informed that the current plan contravenes both City and London Plan policies.

Impact on daylight and sunlight - To cut to the chase, it is clear that this big building will reduce light to the neighbouring flats. The only appropriate mitigation is a reduction in the height of the proposed building.

Size and scale - This is touched on above re light reduction, but it is obvious that the proposed building is too big given its placement next to a Grade II Listed Estate and several conservation areas. This plan should be revised, similar to the prior buildings on Moor Lane to respect the height of the Barbican Estate on the other side of the street.

Terraces and residential amenity - The proposal for terraces that are opposite the bedrooms and living rooms of residents should be taken out of the proposal or access strictly limited - perhaps not after 6pm on weekdays, and no access at weekends and Bank Holidays. Further, plans must be in place to reduce the flood of artificial light into the street at night.

Don't demolish - retrofit - last but not least, the building should be retrofitted. Demolition in 2024 is a last resort. Not a first.

Yours faithfully

Christopher Makin
21 Speed House, Barbican, London, EC2Y 8AT

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Tenter House planning application 24/00209 objections
Date: 07 May 2024 12:27:38

THIS IS AN EXTERNAL EMAIL

The reason for each issue is residential amenity. The objections are summarised below and for each there is a solution, as described below:

1. The access route to the service yard for all vehicles from any direction is proposed to be from Moor Lane despite the fact that all Tenter House vehicles have previously accessed from Moorfields - SOLUTION all vehicles should access only from Moorfields
2. The service yard is not large enough for vehicles to turn around so that the beepers on all vehicles reversing out will cause a noise nuisance - SOLUTION the yard should be enlarged
3. Light spillage from 22 storeys into the bedrooms of 145 flats of Willoughby House needs a planning condition to fit automated blinds on the west facing windows - SOLUTION fit automated blinds
4. 60 sqm of terracing on 12 floors and a large terrace on the 14th floor can cause a noise nuisance and needs a planning condition to close the west facing terraces at 6pm and at weekends - SOLUTION close terraces at 6pm
5. The waste strategy is not clear- SOLUTION **A planning condition is needed to require waste bins, compactors etc to be stored inside the servicing yard and for delivery/collection of waste to be contained within the building**

Yours sincerely

Ian Williams
111 Willoughby house
Ec2y8BL

Sent from my iPad

Graham Webb
318 Willoughby House
Barbican
London EC2Y 8BL

City of London
Dept of the Built Environment
Guildhall
London EC2P 2EJ

7 May 2024

Dear Planners,

Tenter House – planning application ref. 24/00209/FULMAJ

I live at flat 318 Willoughby House, with my bedrooms on the lowest level of the block directly opposite the junction of New Union Street with Moor Lane. . I **object** to the proposed development because of the traffic implications (including traffic noise).

The applicant does not acknowledge (or perhaps understand) that Moor Lane needs to be treated in a manner appropriate for a (relatively) quiet residential street (as long established by the City of London through its traffic restrictions). Moor Lane is also a designated ‘safe’ cycle route and is undergoing a ‘greening’ initiative to improve the street environment.

The much larger proposed building means a large increase in the number of deliveries to the loading bay in New Union Street, all proposed to enter from Moor Lane and exit to Moorfields. Deliveries to the original Tenter House accessed the loading bay from Moorfields. This means a huge increase in delivery traffic using Moor Lane. The number of deliveries will be large enough to warrant a complex servicing plan with pre-planned delivery slots. Trucks etc will be forbidden to stop/wait in the privately owned New Union Street but we all know that the drivers will instead sit in Moor Lane with engines running waiting for their time slot. It will be much more appropriate for delivery traffic to enter and exit from the entirely commercial street of Moorfields, as happened for the original Tenter House.

It goes without saying that all noisy taxis and couriers **must** be obliged, as a planning condition, to use the front entrance of the building in Moorfields.

These traffic implications are also, of course, a loss of amenity issue on the grounds of noise, as more delivery vehicles using (or worse, parking up in) Moor Lane runs counter to Moor Lane’s status as a quiet residential street. The City has long acknowledged this status, hence the traffic restriction and barrier at Moor Lane’s south end to discourage traffic.

Incidentally, the application’s promotion of New Union Street as a pedestrian thoroughfare is utterly misconceived. Now that the new escalators and highwalk through 21 Moorfields has been opened up, that will be the preferred route from Moorgate Station to all parts of the Barbican. Likewise the unblocked south end of Moorfields now gives good access from Moorgate Station to Fore Street, and City Plaza gives access to Silk Street.

So efforts to make New Union Street a space shared by pedestrians and traffic are superfluous. Instead, the street should be dedicated to deliveries only, which ought to give more room to vehicles and make the servicing of the building a lot easier. This should then enable delivery vehicles to enter

and exit via Moorfields (unquiet commercial area) rather than use Moor Lane (quiet residential area).

Particular comments on the delivery plans are:

- The plan does not propose any time limitations on deliveries to the loading bay in New Union Street, either during the week or at weekends (indeed it suggests that, if there is too much delivery congestion, deliveries could occur pre-7am or late in the evenings). As a bare minimum, the City **must** restrict deliveries into New Union Street to the same hours as have been dictated to the developers of 21 Moorfields next door in Moor Lane.
- The plan's proposal to schedule all deliveries in advance clearly won't work for motorcycle/bicycle couriers, who will be delivering small packages to offices at short notice and often well outside the restricted hours for loading bay deliveries (often on noisy motorcycles). The City **must** dictate that the developers provide a courier reception as part of the office reception on Moorfields, much farther away from the Barbican (cf. the 21 Moorfields courier reception on Fore Street Avenue).
- The plan's proposed "Goods In Manager", operating from the New Union Street loading bay, won't have a clue what is happening in Moor Lane, even if the current entry barrier to New Union Street is retained. For all he/she knows, delivery vehicles may be backed up and/or parked up in Moor Lane with engines running – a particular problem with refrigerated goods for the retail outlets. It's not good enough to dictate to suppliers that they should switch off engines while stationary in the loading bay; the instructions should also cover New Union Street and Moor Lane.

In addition, if the plans were to be approved, the City **must** give assurances to the developer (which Barbican residents can rely on) that any and all future pedestrian schemes implemented in Moorfields will not, in any way, impede the planned one-way operation of New Union Street with egress of all delivery vehicles from New Union Street into Moorfields (and north to Ropemaker Street) guaranteed. The alternative, of a fully pedestrianised Moorfields that turns New Union Street into a two-way cul-de-sac too narrow for HGVs to pass each other, would be a nightmare for both the building's owners and Barbican residents.

Yours sincerely

Graham Webb

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mrs Katherine Jarrett

Address: 504 Willoughby House Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: We object to the revised planning application 24/00209/FULMAJ ref. Tenter House, 45 Moorfields on the following grounds:

1) Impact of Massing / Rights to Light (Residential Amenity).

As residents of Willoughby House we are really worried about the height of the new building with regards to the impact on our right to light. We expect an additional independent assessment of light loss to our particular property and note that we have read the assertions made in Volume 1 (Feb 2024). The revised massing - ref. Volume 3 (Proposal 6.0 section 6.1 massing) is likely to further obstruct this amenity to an unreasonable level, which we raised concerns about previously with regards to 17/0150/FULMAJ. Volume 3 is of particular concern; the proposed building is now a huge 12m taller than the previous planning application.

2) Impact of Massing: Noise Pollution (Residential Amenity)

8477sqm of additional floor space will lead to a significant increase of deliveries above and beyond what had already been agreed. This will have a significant detrimental impact on noise levels for us as residents. Access route to the service yard should be from the Moorfields side rather than Moor Lane given the proximity of the proposed service routes to many residential premises.

3) Green space - As the existing Tenter House building is being demolished under an old planning consent, the current applicants can claim that there is very little embedded carbon to consider in this new scheme, thereby somewhat disingenuously side-stepping the City's "retrofit first" policy.

4) Impact of Roof Terraces and Balconies - Noise Pollution

We would request that, as previously, we request the setting of conditions as to the use and timing of terraces in order to preserve the amenity of ourselves as owners of a neighbouring residential property.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Ms Patricia McGettigan

Address: Flat 341 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment:I object to the demolition of the existing Tenter House because it wilfully contributes to environmental harm through the release of vast amounts of climate warming carbon dioxide currently locked within the structure of the existing building. In the context of our rapid global warming, the existing building should be repurposed, not demolished.

I object to the construction of a new 22 storey building on the site of Tenter house and surrounds because:

1. It will generate continual and excessive amounts of traffic, especially of delivery vehicles and of heavy waste pick-up vehicles, alongside a residential area with narrow streets and in constant pedestrian and cycling use, destroying amenity, putting vulnerable road users at risk of accident / harm, and causing access problems for residents with their own vehicles, as well as parking problems, traffic jams and excess engine noise.
2. Another huge building, taller than all of the existing buildings in the area, is wrecking the character of the Conservation area of the Barbican, dwarfing the low residential blocks of

Willoughby House and Speed House.

3. There is well-documented evidence of the incapacity of Thames Water to provide reliable (leak-free) water supplies and sewage / waste disposal / drainage for its customers. Demands from yet another massive office block add excessively to water management requirements and place residents and other businesses in the area at risk of supply / service failure.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].
|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mr Michael Friel

Address: 341 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:Dear Sir/Madame,

Policy & Infrastructure

In the current climate of excess office space and low return on investment, it makes no economic sense to demolish and rebuild. The climate contribution from demolition generates more than 2 ton of CO2 per ton of fabric of the building.

The building could be used as a show case for repurposing, with the City of London showing the world how it is possible.

This is not wise use of CoL assets.

Apart from the noise and light disturbances, there is also the loss of light caused by overshadow of a 22 story building.

The pollution from noise, dust, fumes and traffic will add to increasing emissions of the City.

Nor is there enough space for the safe managing of traffic, demolition trucks and equipment, to and from the site.

The risk of death and injury to pedestrians, cyclists and commuters in a high area.

The challenge of parking in an already narrow road infrastructure will be exacerbated by adding such a high density building. Are there adequate water, electric and sewage infrastructure?

The effect on a conservation area is not taken into account.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

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Case Officer: Amy Williams

Customer Details

Name: Ms Patricia McGettigan

Address: FLAT 341 WILLOUGHBY HOUSE BARBICAN LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity


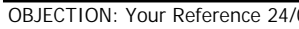
Comment:I object to the demolition of the existing Tenter House because it wilfully contributes to environmental harm through the release of vast amounts of climate warming carbon dioxide currently locked within the structure of the existing building. In the context of our rapid global warming, the existing building should be repurposed, not demolished.

I object to the construction of a new 22 storey building on the site of Tenter house and surrounds because:

1. It will generate continual and excessive amounts of traffic, especially of delivery vehicles and of heavy waste pick-up vehicles, alongside a residential area with narrow streets and in constant pedestrian and cycling use, destroying amenity, putting vulnerable road users at risk of accident / harm, and causing access problems for residents with their own vehicles, as well as parking problems, traffic jams and excess engine noise.
2. Another huge building, taller than all of the existing buildings in the area, is wrecking the character of the Conservation area of the Barbican, dwarfing the low residential blocks of

Willoughby House and Speed House.

3. There is well-documented evidence of the incapacity of Thames Water to provide reliable (leak-free) water supplies and sewage / waste disposal / drainage for its customers. Demands from yet another massive office block add excessively to water management requirements and place residents and other businesses in the area at risk of supply / service failure.

From: 
To: 
Subject: OBJECTION: Your Reference 24/00209/FULMAJ
Date: 08 May 2024 06:36:15

THIS IS AN EXTERNAL EMAIL

Good morning

OBJECTION to Planning Application Reference 24/00209/FULMAJ - Tenter House, 45 Moorfields, London, EC2Y 9AE

Proposal Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Size and scale:

The proposed building is too big given its placement next to a Grade II Listed Estate and several conservation areas. This plan should be revised, similar to the prior buildings on Moor Lane, to respect the height of the Barbican Estate on the other side of the street.

Terraces and residential amenity:

The proposal includes 60 sqm of terracing on floors 2, 4, 6, 8, 10, 12 and a larger one on 14, all directly facing residential homes of Willoughby House and Brandon Mews. Noise nuisance from the use of terraces has been significant for residents on Moor Lane and there has been a precedent set for them to be closed in the evening and at weekends.

The terraces will directly impact on a significant number of directly adjacent homes and the addition of planning conditions to control use is always open to abuse in the practical operation of a building.

Thus this proposal for terraces that are opposite the bedrooms and living rooms of residents should be taken out of the planning (highly preferred) or at the very least access strictly limited.

Failing an amendment to exclude the terraces we need a planning condition to close the terraces next to our flats (west facing) at 6pm. We notice that the CoL application for London Wall West had a (CoL proposed) condition that terraces be closed at 6pm and at weekends. We ask for the same, a condition that terraces are closed at 6pm and at weekends.

Traffic and servicing:

The new plan will send ALL projected 88 vehicles a day into New Union Street from Moor Lane! This can start at 7am. Moor Lane has not been the servicing point for Tenter House and is a key cycle route, an important pedestrian route (including a natural route for schoolchildren to local schools as well as the route for many to the Barbican Arts Centre) and should be a quiet residential street as it is overlooked by hundreds of bedrooms in Willoughby House and Brandon Mews.

The increased traffic will cause inevitable loss of amenity with noise impact to the residential dwellings in Willoughby House and Brandon Mews. This will be amplified by the canyon effect, given the road is already bordered by tall buildings and is a known acoustic bowl.

There is also risk of noise impact to the same dwellings if vehicles are not given space to turn within the proposed building and are expected to reverse out on to New Union Street.

Furthermore, increased traffic if routed from the north, may create conflict / increased hazard to pedestrians crossing Moor Lane.

Finally, routing traffic along Moor Lane seems to oppose the spirit of the City of London's previous proposals '*to create greener, biodiverse and environmentally resilient Moor Lane*'.

Therefore we propose that planning requires service traffic to enter and exit the building from Moorfields with turning space required to be provided within the building.

Impact on daylight and sunlight

It is clear that this big building will reduce light to the neighbouring flats. The 2020 Permission extends to 87.9m AOD, whilst the 2024 Proposal extends to 99.9m - twelve metres higher. The detrimental impact of this height increase on daylight to Willoughby House is significant and cumulative. The only appropriate mitigation is a reduction in the height of the proposed building.

The analysis for this planning application should at the very least give the analysis showing the change from the present 11 storey building to the proposed 22 storey building so that those affected can make representations

Light Spillage:

Plans must be in place to reduce the flood of artificial light into the street at night and there needs to be a strict planning condition to fit automated blinds to west facing windows as part of any approval.

Policy DM 15.7 of the London Plan states '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.... The CoL planning guidelines recommend the fitting of automatic blinds to windows that overlook residential properties.

We know from experience of that lights in offices are left on 24/7, despite automated lighting systems. Our experience with neighbouring developments shows that automated blinds are the only thing that work and this makes a significant difference to wellbeing for neighbouring residents. We also know from experience that leaving this to the fit out stage also does not work,

Yours faithfully

[Redacted signature]

[Redacted line]

[Redacted line]

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].
|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Ms Hilary Sunman

Address: Flat 124 Willoughby House City Of London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application


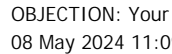
Comment Reasons:

- Residential Amenity
- Traffic or Highways

Comment:Traffic access to New Union Street via Moor Lane will negatively affect residents at the at the eastern end of the estate. When the planning application was first submitted all access traffic was to reach the building via Moorfields, where Tenter House is already serviced from, not Moor Lane. Moor Lane is designated as a cycle and green lane, this is no compatible with the planned 88 vehicle er day.

The proposed building of 22 stories and will result in loss of light and amenity for Barbican residents. In particular the west facing terraces facing Willoughby House should be closed at 6pm to protect residents from noise and light pollution. these terraces should also be fitted with automated blinds to protect residents from light pollution.

Moor Lane has been blighted with building traffic for the past several years; access to Tenter House via Moorfields would protect Willoughby residents from this blight continuing.

From: 
To: 
Cc:
Subject: OBJECTION: Your Reference 24/00209/FULMAJ
Date: 08 May 2024 11:09:44

THIS IS AN EXTERNAL EMAIL

8 May 2024

OBJECTION to Planning Application Reference 24/00209/FULMAJ - Tenter House, 45 Moorfields, London, EC2Y 9AE

Proposed Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

I wish to object in a number of respects to the new proposals for the rebuild of Tenter House.

Please note that I have no objection in principle to rebuilding Tenter House on its current site but for those of us living nearby there are a number of serious issues with the current proposal. I will summarise them here.

1. The proposed building is too high. It will obstruct our morning sunlight - which currently pours unobstructed into our bedroom since the sun rises directly over the current building across Moor Lane. This morning light is really very important to our well-being, and no amount of monetary compensation will alleviate this loss. Sunrise was beautiful this morning.
2. I note it is suggested that “the overhang” on our Barbican building (Willoughby House) already obstructs light from the east - this is utterly untrue.
3. Our flat (106 Willoughby House) is on Floor 1, immediately above the podium, and directly faces the proposed new building.
4. Moor Lane is designated as a major cycle route, and as a pedestrian preferred roadway. Indeed there are plans, as yet unfulfilled, to green this small street. Indeed, it is proposed to narrow it further as part of this evolution. It is not designated as a Service road for major buildings. It is unsuitable for such access, being narrow with difficult access, and partially blocked at its southern end by a gate closed at night and weekends/holidays. This restriction is essential to our well-being. Moor Lane should NOT be used for access by a major new building at Tenter House. New `Union Street is difficult to access, even for cars, and reversing vehicles are particularly noisy with reversing ‘beepers’ and revving engines. The Simmonds and Simmonds and other new buildings on the east side of Moor Lane are well managed and of appropriate height. They do not use Moor Lane for access - except for Deutsche Bank, and that organisation has shown exemplary restraint and understanding.

5. The new building will loom threateningly over our eastern views. Its height should be reduced to its original planned height, which was acceptable.

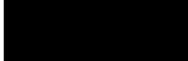
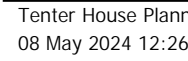
6. The new proposal adds balconies/terraces directly overlooking our bedrooms. These will encourage socialising outside and constitute a noise nuisance as well as a “peeping Tom” threat to our bedrooms.

All Willoughby House bedrooms overlook Moor lane, and are therefore vulnerable to this new design, as well as to the increased noise and disruption. These balconies/terraces should be removed from the design. At the least they should be closed after 6.00pm, as is the case for other buildings abutting Moor Lane.

7. Light pollution is an ever-present hazard. The City has not succeeded controlling this hazard to our rest, even with automatic interior lighting systems; an effective solution is urgently needed. Lighting control regulations should be enforced to manage this in the new Tenter House.

In summary: the new proposal rides thoughtlessly over residents’ amenities and their enjoyment of their living space. Its increase in height is particularly troublesome and the negative effect on the future of Moor Lane as a green corridor for cyclists and pedestrians has been ignored.

Michael Swash MAE MD FRCP FRCPATH
Professor of Neurology (emeritus)
St Bartholmew’s and the Royal London Hospitals etc

From: 
To: 
Subject: Tenter House Planning Application -- Objection - 24/00209/FULMAJ
Date: 08 May 2024 12:26:38
Attachments: [WHG Objections to Tenter House application May24.docx](#)

THIS IS AN EXTERNAL EMAIL

To whom it may concern

The Barbican residences and the streets surrounding them were designed to be and should remain residential. We observe, however, that commercial and finance companies are increasingly asking for more space and destruction of existing commercial and office buildings in order to replace them with even larger commercial and office buildings. In my opinion and in the opinion of the vast majority of residents in the Barbican, they are being given far too much consideration by the City of London, who wish to gain financially from them despite all their negative consequences for those of us who have to live next door to them. They are also using up our time to reject these repetitive proposals, which violate existing environmental protection policies, and need both to be strictly adhered to and greatly increased.

In every email I have sent, week after week now, I have had to repeat these views. You are ignoring them completely. Watch the Tory government at national and local level being kicked out of office for lining their own pockets and ignoring the views and needs of people across this country. Look in a mirror.

I am attaching the response from Willoughby House, which expresses everything I also stand for and which I ask you to take into account. The streets around us were not designed or intended to cope with 30-40-50-60-80-90 huge delivery trucks coming and going all day. They bring noise pollution, dust and dirt pollution, damage the streets and make it impossible for pedal bikes and walkers to move about easily. They destroy the pathetic greenery that has been planted along them as well. Just as the years of building works across from Willoughby House and the noise and trucks and pollution accompanying them are finally disappearing from the area, you ask to extend it for years more to come just up the road. You have located an ear-splittingly loud, smelly, air polluting object to sit in Silk Street to be recharged for months, taking no responsibility for the effects on the people who live and work all along Silk Street who are being negatively affected by it. We used to have birds in our gardens who some of us feed on our balconies and in the gardens. They have almost all disappeared since that bloody noise began, and I was advised by a wildlife trust where I buy birdfood that the noise is likely to have frightened them away. And all you want to do is introduce more noise and more pollution. I object, I object, I object. Ask me again and I will object again, and so will all of us. Why don't you take your gigantic buildings somewhere else and consider going with them and putting up with the pollution yourselves instead.

Very sincerely,
Margaret Berer
114 Speed House

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].
|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Dr Dimitri Varsamis

Address: Apartment 83, Roman House, Wood Street, London EC2Y 5AG

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I object to the construction of a new 22 storey building on the site of Tenter house and surrounds because:

one of the most obvious ways to help the climate is to reuse and repurpose existing buildings rather than knocking them down and starting again. Any green measures such as solar panels have a negligible impact when compared to the embodied carbon in a new development. Why is a new 22-floor building needed?

There is already a significant loss of light due to the buildings next to Barbican flats on Moor Lane. Each individual proposal is positioned as a small loss of light, a small increase in traffic, a bit more noise but the cumulative effect is hugely detrimental to residents.

In the current climate of excess office space and low return on investment, it makes no economic sense to demolish and rebuild. The climate contribution from demolition generates more than 2 ton of CO2 per ton of fabric of the building.

it wilfully contributes to environmental harm through the release of vast amounts of climate-warming carbon dioxide currently locked within the structure of the existing building. In the context of our rapid global warming, the existing building should be repurposed, not demolished.

It will generate continual and excessive amounts of traffic, especially of delivery vehicles and of heavy waste pick-up vehicles, alongside a residential area with narrow streets and in constant pedestrian and cycling use, destroying amenity, putting vulnerable road users at risk of accident / harm, and causing access problems for residents with their own vehicles, as well as parking problems, traffic jams and excess engine noise.

Another huge building, taller than all of the existing buildings in the area, is wrecking the character of the Conservation area of the Barbican, dwarfing the low residential blocks of Willoughby House and Speed House.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Ms Gabrielle Oliver

Address: 308 Willoughby House, Barbican, London EC2Y 8BL

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

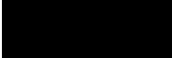
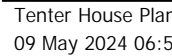
Comment Reasons:

- Noise
- Other

Comment:I object to the extra storeys added to this building which will increase the traffic in the area, producing reduction in the air quality.

Plus an increase in noise.

I am a resident of Willoughby House and will be affected by the changes to this building.

From: 
To: 
Subject: Tenter House Planning Application Objection 24/00209/FULMAJ
Date: 09 May 2024 06:57:25

THIS IS AN EXTERNAL EMAIL

Dear planning team,

The purpose of this email is to explain my objections to the Tenter House Planning Application and to provide constructive comments on how to address these concerns.

My objections are primarily noise and excessive light as explained below. In each case the reason for the objection is residential amenity. I am a resident of Willoughby House, Barbican.

Noise

At present Moor Lane is not the access route for Tenter House. Moving access from Moorfields to Moor Lane will significantly increase traffic noise for the many flats along Moor Lane. Continuing access from Moorfields will alleviate this issue. It will also allow cyclists to continue to use Moor Lane comfortably.

The proposed Tenter House service yard is not big enough to allow vehicles to get into New Union Street from Moorfields without turning around. Enlarging the Tenter House service yard (as it was in LWP and 21M) means all vehicles can drive into New Union Street from Moorfields, turn round into the service yard and drive out forwards to Moorfields without the need for noisy reverse beeping.

The proposals include many outdoor balconies. A reasonable suggestion is for these balconies to be vacant after 6pm and on weekends.

All bins, compactors and so on must be stored inside the servicing yard and delivery and collection of waste must be contained within the building. Otherwise the sound of rubbish being thrown in and taken out will disturb the many people who live in the nearby Barbican.

Excessive light

Modern buildings tend to have very bright lights on all day and all night. The Tenter House lights will shine directly into the bedrooms on the west facing side of the Barbican. Automated blinds on the west facing windows would mitigate this effect. This must be a condition of planning consent to be effective.

Many thanks
Melissa Marks

From: [REDACTED]
To: [REDACTED]
Subject: Tenter House, application ref 24/00209/FULMAJ
Date: 09 May 2024 09:08:54

THIS IS AN EXTERNAL EMAIL

Dear Planning Team

I write to raise my concerns about this planning application. I am a resident of Willoughby House, and my bedroom overlooks the development.

I have two areas of concern:

Loss of light

While I am less affected by this than neighbours whose living areas overlook the site, I am concerned that there will nonetheless be some impact on rooms (and balconies) on the west side of Willoughby House, given the proposed height of the new building and the potential to overshadow Willoughby House. I have had a letter from the developers that appears to acknowledge that loss of light is a likely consequence of the proposal. Vague offers to consider financial compensation do not reassure me.

Moor Lane traffic

This is an area of very significant concern to me, both during the development phase and once the building is complete and occupied. I understand all delivery vehicles will enter the site via Moor Lane, close to my bedroom window. Noise and disturbance will be the inevitable consequence, and it is particularly unacceptable that sleeping accommodation should be affected in this way. I have already been disturbed on numerous occasions by traffic in Moor Lane, often very early in the morning, including motorcyclists revving their engines and lorries delivering, loading and unloading materials, with scant respect for residents. This is despite attempts to restrict traffic in Moor Lane outside working hours. I am extremely anxious about the significant increase in noise and traffic that this new development will generate.


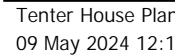
I hope these points will be given very careful consideration.

Yours sincerely

Katherine Green

711 Willoughby House
Barbican EC2Y 8BN

[REDACTED]

From: 
To: 
Subject: Tenter House Planning Application Objection - 24/00209/FULMAJ
Date: 09 May 2024 12:14:29

THIS IS AN EXTERNAL EMAIL


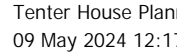
Tenter House Planning Application Objection - 24/00209/FULMAJ

We are long term residents in Willoughby House, having bought our property, which is on the western end of Willoughby, more than 20 years ago. As such, we have seen the problems caused by construction works that have taken place in the surrounding streets over the last number of years. This latest planning application will significant impact on our property with loss of light and sky view as well as loss of privacy if a 22 storey building was approved directly across the street from the Barbican. Added to this is the increase in noise and light pollution that will come in to play not only during construction but also post construction.

At a very minimum, strict planning conditions are required for the terraces that will face our property and others on western side of Willoughby House with closing times to coincide with City closing hours, in line with that mandated for the planning application for London Wall West. Also required are window fittings such as blinds, that would close automatically and be installed at construction stage, to reduce light pollution into bedroom windows (including ours) after dark.

I trust that our objection and those of a large number of other Barbican residents who will be adversely affected by the planned construction, will be taken on board in any decision taken in regard to the Tenter House application

Yours sincerely
Richard and Ann Holmes

From: 
To: 
Cc:
Subject: Tenter House Planning Application Objection - 24/00209/FULMAJ).
Date: 09 May 2024 12:17:57

THIS IS AN EXTERNAL EMAIL

We are owners of a flat in Speed House.

I object to the current planning application for the replacement of Tenter House. The proposed building would be twice the height of the existing one and would therefore cause a loss of light to our neighbours in Willoughby House as well as Speed House Gardens which we overlook. Moreover, the terraces will create noise and therefore need to be closed in the evenings as this is a residential area.

After dark there will be light pollution for Willoughby House from internal lights so automated blinds must be a condition of approval.

The service yard must be large enough for vehicles to turn without reversing as beeping is very unpleasant for us flat dwellers and it is likely to occur early in the morning.

The entrance into New Union Street must remain from Moorfields rather than the proposal for it to be from Moor Lane. Moor Lane has been identified for several years as an area which should have 'greening'. If service vehicle use it then Silk Street is likely to suffer from increased traffic too. It is likely to be noisy early in the morning and wake us as all Speed House bedrooms are on Silk Street.

Yours sincerely

Philippa and David Andrews
76 Speed House
Barbican
EC2Y 8AU

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].
|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mr Nazar Sayigh

Address: 301 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: We write to object to the planning application at Tenter House on the following grounds:

- Loss of light; we will suffer excessive loss of light as a result of the development, impacting our amenity.
- Servicing; there is inadequate provision for servicing, relying on sole access from Moor Lane via New Union Street as opposed to Moorfields.
- Noise; as a result of inadequate servicing provision, vehicle movement will generate significant noise and disturbance.
- Traffic and Highways; as a result of inadequate servicing provision, there will be significant traffic

impact on Moore Lane.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].
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Case Officer: Amy Williams

Customer Details

Name: Mrs Charlotte E Bradford

Address: Flat 514, Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I have two principal objections: loss of light and noise. My flat is one of those already subjected to loss of light by the previous proposals for Tenter House. A building of greater mass is likely to lead to greater loss and, of course, view of the sky. Not only would that adversely affect my current enjoyment of the flat, but it could also impact on the value of my flat should I choose to sell it. I imagine my building surveyors would have given different advice had these proposals been made clear at the outset, and my actions might have been different. My second point is about noise nuisance from servicing the building along New Union Street. My flat is directly opposite and well within earshot of any vehicle movements, especially those that use audible reversing and turning warnings. All the rooms along the Moor Lane side of Willoughby House are bedrooms and we must not be subjected to this scale of nuisance. The building should not be serviced from Moor Lane. Finally, provision must be made to ensure that no light pollution is caused by lights being left on in Tenter House overnight, unless blinds are required to be fitted and used.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Fiona Lean

Address: 251 Ben Jonson House Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I object to the application for the following reasons:

The terraces will give rise to noise nuisance: a condition is needed to limit their use to routine office hours only - they should not be used after 6pm daily and at weekends.

The additional height of the building will reduce the already limited sunlight enjoyed by residents in some of the surrounding Barbican flats.

The provision for waste disposal in the servicing yard will cause noise nuisance by the actions of disposing of waste in the bins and its removal. Provision for all this should be within the confines of the building.

The expansion of the building will necessitate increased deliveries to the site and along a proposed new access route, adding to the traffic in this area.

Fiona Lean
251 Ben Jonson House
Barbican EC2Y 8DL

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].
|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Ms Scarlett Roux

Address: 333 Willoughby House BARBICAN London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:With regard to the development of TENTER HOUSE site (45 Moorfields, London, EC2Y 9AE)

To note that this development has been ongoing (since the late 1990's) with successive schemes and each proposal incrementally increasing the building height!

I would like to record my OBJECTION to the latest plans (ref. 24/ 00209 / FULMAJ) currently being considered by the City of London Corporation.

SIZE + SCALE | LOSS OF LIGHT & WIND TUNNEL EFFECT OF TALL BUILDINGS

Overbearing height at 22 stories and TWICE the height of the existing building. The area is not designated by City of London as a "tall buildings" area (such as the "Eastern Cluster" & Fleet

Valley).

Excessive loss of *daylight* in addition to loss of direct sunlight.

Wind tunnel effect which would only add to that already experienced around CityPoint/Ropemaker.

LIGHT POLLUTION

Potential nighttime light pollution overspilling onto residential area.

AIR QUALITY

Environmental pollution caused by the demolition & lorries removing debris, waste (& carbon) from site, plus developer's proposed 88 deliveries a day.

RELATED CONSTRUCTION NOISE

Noise from construction lorries (including reverse 'beeping' noise) on the adjacent Moor Lane (including weekends) and New Union Street. This pattern has previously been experienced in relation to the building of Deutsche Bank at 21 Moorfields.

EXTRA DEMANDS ON LOCAL RESOURCES

Concern about the supplies of electricity & water, etc, to the local area & the unreliability of their current supply being stretched even further without adequate infrastructure planning. Waste management measures, or the scale of, don't appear to be very clearly delineated.

To reiterate that I am formally objecting to the demolition of the 11 storey "Tenter House" (permission for which was granted -2018- by the Planning Committee led at the time by Councillor Chris Hayward). The destruction of this dignified building which represents a more measured approach to city planning, would be regrettable.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Dr Paul Horsnell

Address: 326 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:Am concerned that the access road for the service yard for the development goes via Moor Lane rather than access via Moorfields as for the current building on the site. This will increase noise, particulate emissions and disruption on Moor Lane significantly given the number of extra vehicles involved. Such a large increase in traffic runs counter to the Moor Lane greening project and the Healthy Streets Initiative that is currently under discussion. The plans unnecessarily divert lorries (and the associated noise and local air quality issues) much closer to a residential area. A larger service yard and accessing via Moorfields as has been the case for the current site would greatly reduce the consequential loss of residential amenity for Barbican residents.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].
|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mr David Hall

Address: 509 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:I am writing to formally object to the planning application referenced above for the development of Tenter House. I have significant concerns regarding the proposed plans that must be addressed before approval is granted.

First and foremost, the new planning proposal needs to be lowered and imposed in a location facing a listed residential estate. We can see that in the work that the applicant is concerned about loss of light fundamentally proving an adverse affect on residential amenity.

I want to draw attention to the issue concerning traffic management. Presently, Tenter House is not serviced from Moor Lane. However, the new proposal suggests that all projected 88 vehicles per day will access New Union Street via Moor Lane.

Moor Lane is overlooked by many bedrooms, including those of my daughter and me, and I know


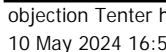
how disruptive traffic can be. This will affect both ends of the day, and I understand that the traffic can start as early as 7 am. This is a matter of utmost concern and needs immediate attention.

Having lived above Moor Lane for over 20 years, I know that simple traffic noise is not the only disturbance. The service design doesn't provide enough space for vehicles to turn and, so vehicles will be forced to reverse out with loud warning noises, making it far worse. This design needs to be rejected and revised.

Furthermore, I strongly urge the imposition of a planning condition regarding installing automated blinds on west-facing windows. Light pollution remains a significant issue in Moor Lane, and it needs to be managed by a planning condition.

Lastly, to protect residential amenities and preserve the tranquillity and privacy of residents residing close to the proposed external terraces/ spaces, a planning condition needs to be applied to close them at 6 pm.

In conclusion, while I appreciate the efforts towards urban development, the concerns of local residents must be considered.

From: 
To: 
Subject: objection Tenter house
Date: 10 May 2024 16:56:35

THIS IS AN EXTERNAL EMAIL

24/00209/FULMAJ Tenter House Objection

I am James Ball, of 7 Brandon Mews

I am the Brandon Mews House Group representative on the Tenter House project.

We have numerous objections to both this development and the demolition process, but for ease of Planning Office consumption restrict the comments to these.

Comments:

During the process of demolishing and then beginning construction at 21 Moorfields we were subject to torrents of dust. Only after protracted objections and the contractor agreeing to be more neighbour friendly did we get a number of measures to reduce dust. This dust blows right under Willoughby house and into our roof area ventilation.

We also faced a barrage of deliveries, trucks with engines left on, workers smoking and discarding litter on the pavements and ramp to our car park (Brandon Mews residents all have car park level front doors). It took over a year to curb these practices.

The Corporation planners should control this in planning conditions this time.

Objections:

<!--[if !supportLists]-->1) <!--[endif]-->The current plans add over 80 deliveries along Moor Lane to service construction and then operation of the Tenter House project and subsequent building. This is totally unacceptable, especially after Moor Lane has been landscaped and made more peaceful with the exterior completion of 21 Moorfields. It is perfectly possible and far preferable to service Tenter House from Moorfields. We already have around 100 deliveries from City Point tower and do not need any more; indeed cannot take any more.

<!--[if !supportLists]-->2) <!--[endif]-->The proposed increased height to 22 floors is an awful idea, further restricting natural light and totally out of character with the recent buildings along Moorfields. It should be curtailed at no more than the already too high 18 floors.

<!--[if !supportLists]-->3) <!--[endif]-->A notable breakthrough in design stage planning occurred with the agreement to install night blinds on resident facing

windows at the design stage. At the east end of the Barbican we already have unsightly lit office windows in City Point. Please insist of this.

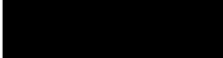
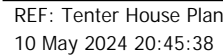
- 4) Please ensure all west facing terraces close at 6pm. We suffer huge amounts of noise even from ground level drinking in that area.

Best Regards

James

James Ball



From: 
To: 
Subject: REF: Tenter House Planning Application Objections - 24/00209/FULMAJ
Date: 10 May 2024 20:45:38

THIS IS AN EXTERNAL EMAIL

Sir/Madam

It will result in loss of light and sight of the sky, only the cumulative impact on noise and amenity, increased light pollution, significant impact on Moor Lane traffic (not just in construction but subsequent operational deliveries - ironically a quiet cycle superhighway with a greening plan in progress), and will create precedent for Silk Street and other developments coming up.

1. ACCESS ROUTE from Moor Lane into New Union Street

There is no reason that access to the service yard cannot be from Moorfields as it has always been for Tenter House.

During discussions on the demolition traffic we were told that the CoL Traffic Department's view was that the footfall at the Moorfields entrance was too large. This is clearly not the case as these photos show the New Union Street/Moorfields junction at various times during the morning and afternoon on a mid-week Wednesday.

The extra 4 storeys increases the office space, this in turn generates an extra 20 deliveries a day, taking it to 88 vehicles every day accessing the service yard.

Moor Lane is a priority street for a greening project that has been on hold for some years. It is also in the Healthy Streets initiative which is being decided over the next few months.

It is for planning committee to consider others within the community who live here and those who work in the environment you are responsible for.

Yours faithfully,

Gillian Castle Stewart

Dowager Countess Gillian Castle Stewart
539 Willoughby house
London. EC2y 8BN

- Sent from my iPad

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

|cr| |cr|Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Case Officer: Amy Williams

Customer Details

Name: Mr Edward Mceneaney

Address: Flat 110 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

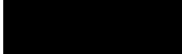
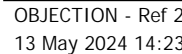
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: Considerations for the planning department

My two main concerns with the proposal are traffic issues and the light problem

1) The use of Moor Lane as the access point for commercial traffic both during and after construction will be very detrimental for the many people and families living on Moor Lane. The increased volume of heavy vehicles will generate increased noise and pollution for the many local residents (in excess of 100 flats in Willoughby House alone) on and near to Moor Lane.

2) Light is becoming an increasingly rare commodity for Moor Lane residents due to the building activity of the last 15 years, and the proposal for Tenter House will deteriorate this problem even more so.


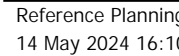
From: 
To: 
Subject: OBJECTION - Ref 24/00209/FULMAJ
Date: 13 May 2024 14:23:47

THIS IS AN EXTERNAL EMAIL

Over the past 27 years, this site has seen a series of increasingly large planning applications, with the current Tenter House still standing and no significant demolition started. Despite having permission for an 18-storey building, the applicant suggests treating it as built for daylight/sunlight but demolished for carbon impact. This approach undermines established policies on Whole Life Carbon and overlooks the true carbon impact of demolition. My objections to the application are based on several factors, including inadequate consideration of demolition in the Whole Life Carbon Assessment, unacceptable loss of daylight/sunlight, and disproportionate size/scale of the proposed scheme in relation to heritage assets. Concerns also include potential noise pollution, light pollution, and inadequate traffic and servicing arrangements. The proposed scheme's impact on residential amenity, traffic, noise, and light pollution is further highlighted, along with insufficient community contributions. In conclusion, the new scheme is significantly larger and closer to its neighbors, posing detrimental effects on views, homes, and heritage assets.

I urge you to REJECT this application.

Brenda Szlesinger
Flat 112 Thomas More House
Barbican
EC2Y 8BU

From: 
To: 
Subject: Reference Planning application 24/00209/FULMAJ
Date: 14 May 2024 16:10:56

THIS IS AN EXTERNAL EMAIL

Dear Sir

TRAFFIC ACCESS-EGRESS

We object to the requirement for traffic to and from the Tenter House service bay at New Union Street should travel in one direction and use Moor Lane.

This requirement appears to be made in isolation of the future traffic arrangements within the proposed greening of Moor Lane as part of the Bunhill, Barbican and Golden Lane Healthy Neighbourhood.

Traffic to and from Tenter House previously travelled through Moorfields, and unless there are more satisfactory arrangements as part of the Healthy Neighbourhood, should continue to do so.

SIZE OF SERVICE BAY

We object to the small size of the service bay. Vehicles will be unable to turn within it. They will need to reverse out into New Union Street using a hazard warning sound that will cause considerable disturbance and irritation to surrounding residents.

WASTE STRATEGY

We object that waste is to be stored adjacent to but not within the service bay. This means that the noise of waste being handled in the open air will carry as far as the Heron and cause unnecessary disturbance. The storage and handling of waste should be within the building.

Kind regards

Colin Davis
for
The Heron, 5 Moor lane
Residents Committee



<https://www.londonstartshere.co.uk>

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

14 May 2024

For the attention of Ms Amy Williams, Senior Planning Officer

Dear Ms Williams

Reference

24/00209/FULMAJ

Address

Tenter House 45 Moorfields London EC2Y 9AE

Proposal

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Barbican Quarter Action's OBJECTIONS to this application primarily concern the following factors:

1. Increased height and mass leading to loss of daylight and sunlight, potential light pollution, and noise disturbance from terraces and 'woodland'.
2. Unacceptable access, entry, and servicing routes which will have a negative impact on residential amenity.
3. Negative impact on townscape and heritage.
4. Deficits in the application process and information provided, particularly regarding the Whole Life Carbon Assessment and Daylight, Sunlight, and Overshadowing Reports.

Loss of Daylight and Sunlight; Overshadowing:

- Proposed development significantly increases height and mass, resulting in a loss of daylight/sunlight.
- Concerns raised about the impact on neighbouring properties, particularly Willoughby House.
- Cumulative impact of recent developments in the area needs consideration.
- Applicant's report on the issue lacks credibility.

There is urgent need for a revised report detailing the impact on neighbouring properties and third-party verification: On 24 April 2024, we requested (public comment by Jan-Marc Petroschka, BQA) *“the Daylight, Sunlight and Overshadowing Report to include the visual depiction of the Transient Shadow Results, on 20 March, 20 June and 21 December - on an hourly basis (...) The analysis should show the pre-existing condition and the proposed condition, and further consider the cumulative impact of Tenter House and 21 Moorfields on the residential properties to the west of the site.”* This requested information has not been forthcoming.

The Daylight, Sunlight and Overshadowing Report has only considered the impact of the additional four floors over the consented 2020 scheme. The comparison against previous breaches presents misleading results which disguise the actual and cumulative impact of the proposed development on residential amenities. The assessment must address in detail the cumulative impact, including from other developments completed since the previous scheme was consented, as requested on 24 April.

The Daylight, Sunlight and Overshadowing Report states in its summary under point 7.6: *“It is clear from the additional assessments undertaken that where transgressions of the BRE Guidelines are identified, they are attributable to the presence of deep projecting balconies on Willoughby House as opposed to the scale of the proposed scheme.”* The claim that it is supposedly the residential building itself, with its 3 ft ‘deep’ balconies, that

causes the transgressions and not the proposed 22-storey tall building is misleading and requires an **independent** assessment as consequently applies to all other findings of the report. This should be made publicly available before the consultation closes. A decision by officers shall be taken on this scheme only thereafter.

Light Pollution:

- Proposed development height and mass raise concerns about light pollution. Strict planning conditions needed to mitigate light pollution.

Noise Pollution from Terraces:

- Terraces and balconies pose a noise pollution risk to nearby residential areas. Strict conditions needed regarding the use and timing of terraces.

Unacceptable Access, Entry, and Servicing Routes:

- Proposed access routes raise concerns about noise and disruption. Service yard design and waste strategy need revision to minimize negative impacts.

Unclear Waste Strategy:

- Contradictory statements in the waste strategy raise concerns about potential noise pollution.

Impact on Townscape and Heritage:

- Proposed development's excessive height damages local townscape and heritage views.
- Contravenes policies aimed at protecting heritage assets and their settings.

The post-war plan for the commercial Barbican area saw a general building height of 8-10 floors with a small number of high-rise and tall buildings strategically placed and projecting above. This compositional clarity has recently been lost as the redevelopment of the lower post-war blocks between Moorfields and Moor Lane has resulted in a continuous wall of tall mega-structures – some attached, others only meters apart – which now connect the previously separate clusters on Ropemakers Street and London Wall. The general building height along Moorfields has doubled, from a medium of 10



floors to over 20 – with far reaching impact on townscape, conservation areas and listed buildings, views and residential amenities.

However, the recent neighbouring buildings along Moor Lane all respect the shoulder height of the opposite Barbican Estate. From the common datum across the street additional building mass is developed away from the residential estate and towards Moorfields. The 2014 completed Moor Place at no. 1 Fore Street increases its height at a shallow angle towards the east of the site; Deutsche Bank at 21 Moorfields adopts the same principles. In stark contrast, the proposed development's seven-storey high block on top of the 15-storey base transgresses the established and gradual height development of its neighbours, placing substantial mass ever closer to the Barbican Estate. The encroaching seven-storey block by itself and in context of its neighbouring buildings will appear out of character and overbearing; it will be detrimental to views and the setting of the Grade II Barbican Estate and its Grade II* listed landscape and gardens.

Whole Life Carbon Assessment:

- Assessment ignores carbon emissions associated with demolition, evading "retrofit first" policy.
- Lack of adherence to City's own policies is concerning.

While it may be technically and legally permissible to demolish a building under one planning permission and erecting a replacement building under another, this sets a dangerous precedent: Basing a Whole Life Carbon Assessment on the latter application and on a cleared site seems equivalent to a planned tax avoidance or rather to tax evasion scheme.

We trust that the City of London would neither want to be associated with tax evasion nor with greenwashing.

Summary:

Application should be **REJECTED** due to numerous concerns regarding residential amenity, environmental impact, and lack of adherence to planning policies.

Best wishes,

Averil Baldwin, Co-Chair Barbican Quarter Action

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Mr Guy Orton

Address: 157 Andrewes House Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I am glad to see the existing building finally go and the new proposal looks very tasteful and in keeping with the surrounding area.

My only request would be to design the commercial space so that there is potential for a Pub. As the last Pub was a great spot, due to the square providing a rare spot for large outdoors drinking away from cars.

From: [REDACTED]
To: [REDACTED]
Subject: YOUR REF 24/00209/FULMAJ re Tenter House 45 Moorfields London EC2Y 9AE
Date: 17 September 2024 14:37:00

You don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

17 September 2024

TO: Amy Williams, Development Division

I am writing in response to your request of 12 September for representations regarding this application.

It has reached a point where I and my fellow residents in the City are having to respond to letters like this asking our views on demolitions of existing buildings and their replacement by taller, wider and bigger buildings almost every week. We are all of us getting increasingly fed up with this, above all, BECAUSE IT IS CITY ENVIRONMENTAL POLICY NOT TO DESTROY BUILDINGS THAT ARE IN GOOD ENOUGH SHAPE TO CONTINUE TO BE USED.

Why your department considers it a valid use of your staff time, which we residents are paying for, and residents' time as well, therefore, in responding to letters asking us to approve your violation of your own policies is beyond my comprehension. A typical TORY behaviour, however, because you think God has given you the right to do whatever you please because you have money and power. Wake up! A large number of buildings in the City of London are empty. Let your rich types take those over and use them.

Every day when we turn on the news, there is flooding in one place and drought in another and fires in still another. Every day I hear that the privatised water I pay for is unclean, affected by sewage, thanks to Tory policies and corrupt private firms whose only aim is to get rich quick and devil take the hindmost. In my fancy Barbican flat, I am unable to drink the tap water in my bathroom in 2024, more than 60 years after my building was built, and have to go to the kitchen for a glass of water to brush my teeth. There is still asbestos in my toilet plumbing cupboard. The heating system does not allow me to keep my flat warm enough in spite of national and international public health policy stating how warm it should be kept, which you pretend you nhave no responsibility for because of an outdated lease.

If the City has nothing better to do than knock down viable buildings, its leaders and staff who do not protest against it should be forced to resign. The leaders of the City and the heads of your department need to get your priorities straight. The extent of corruption and bad policy that is being revealed as taking place in the City, and the resulting loss of millions of pounds, is shocking. It seems the only work you are capable of generating is to knock down viable buildings and replace them, causing unacceptable noise, polluted air, and tons of rubble, further polluting the dying planet we live on.

I say no to your plans. I am 100% opposed to these plans and to any others another one dreams up next week and the next, and into the future, because the Earth cannot cope with the destruction you stand for and it seems your bosses are ignorant of the consequences they will cause. I say NO!

Kind regards,
M Berer
Speed House
Barbican EC2Y 8AU

Tenter House 45 Moorfields London EC2Y 9AE – 24/00209/FULMAJ

From Helen Kay 403 Willoughby House Barbican London EC2Y8BN
25 September 2024

I am writing to object to this planning application on the grounds of Residential Amenity, in particular noise nuisance.

I start with a question and to make it easy for those of you who make decisions about our lives, an easy solution.

Why should the residents along Moor Lane be disturbed by more traffic noise because of choices made by developers and their architects?

This noise nuisance will be a direct result of 2 issues with this planning application, the size of the service yard and the traffic plan. You alone can make the decision to change our lives for the next 20 years:-

SOLUTION:

- Change the design of the lower level so that the service yard is large enough for all vehicles to turn round.
- All traffic to enter New Union Street from Moorfields.
- All traffic to exit forwards and drive the short distance to Moorfields.

This is all possible and here is why and how this should be done -

Service yard -

The proposal is for vehicles to reverse out of the service yard but beepers from reversing vehicles onto NU street will be a serious noise nuisance to Barbican residents. The sound is high pitched and carries a long distance. The CoL recommendation for white noise beepers is not mandatory and is largely ignored.

The architect says the entrance is too narrow to widen because of the core; 21 Moorfields is narrow and they made a turning circle inside to overcome this.

The developers have increased the height from 11 storeys to 21, this increases the deliveries and servicing. It is therefore their responsibility to change the internal design. The architect knew of the problem back in 2016/17 with the original consultation, he remembers us both talking about it.

Traffic plan

The first reason/excuse for wanting all vehicles to access via Moor Lane was that the footfall from Moorgate Station was too large for access to be from Moorfields. I took photos to prove this was not the case - a head count survey was then carried out and found that it is only busy between 0830 and 0945 on the 3 midweek days. We have been told there will be no deliveries before 10am. Thus, the footfall is no longer a problem.

We have been told that all deliveries and servicing are strictly regulated to spread out during the day, un-booked ones turned away with banks men on duty – thus, there is no problem for vehicles to enter and exit from Moorfields

21 Moorfields service yard was moved from Fore Street Avenue to Moor Lane causing a significant increase in traffic for us along Moor Lane. To mitigate this, the service yard was increased so that all vehicles can turn inside.

The new design for Tenter House has removed the ramp from Moorfields down to a car park and delivery area and the developers have made the decision to double the height of the building, both these decisions cause increased delivery and servicing traffic. It must therefore be the responsibility of the developers to make these changes in such a highly residential area.

Moor Lane is already besieged with deliveries and servicing and is on the north south cycleway. The street is included in the Healthy Neighbourhood Scheme that will be described to Streets and Walkways on 1 October. Following that, our much awaited greening scheme for Moor Lane can get started at last. There are proposals that will widen pavements, create more much needed planting, make one-way, even close one end.....

We are told that New Union Street will be one way but it does not need to be, for all the reasons given. With the good management, of which we have been assured, all vehicles can safely enter and exit from Moorfields.

From: [REDACTED]
To: [REDACTED]
Subject: Tenter House Planning Application objection 24/009/FULMAJ
Date: 26 September 2024 14:48:10

You don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

Dear City Planning,

I am writing in objection to the current planning application at Tenter House and would like the following points considered:

1. Noise pollution. Already with Deutsch bank building opening we have experienced a significant increase in noise pollution, mostly owing to increased traffic.

Inspite of apparently there being room for vehicles to turn inside Deutschs building, I am woken daily, bar Sundays, to the relentless sound of traffic and motorbikes, and beeping as vehicles reverse.

This noise carries along way so it is imperative from my view that 1)there be no vehicle access to Tenter house from Moor Lane, vehicles should approach from the Moorgate station side. 2)there be sufficient space for vehicles to turn as noise carries 3) motorcycle parking should be moved to Moorgate side or ideally beyond.

The second point is on right to light as I've not been contacted by anyone inspite of having tried, and my loss of light will be significant.

Thirdly light pollution needs be addressed. Rather than blinds, while a useful interim measure, lights need be programmed to go off entirely at night.

Deutsch building replaced a beautiful building, a refurbished building would have been more aesthetically pleasing. I despair of the approach of the Corporation of London to rid the square mile of interesting, culturally valuable buildings.

Lastly, terraces should not be open at weekends at all, and ideally be closed early Monday to Friday, but certainly before 9pm though I am aware this is already too late for many.

Yours sincerely,

Caroline Bennett
527 Willoughby House

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Mr Scott Palmer

Address: Flat 102 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: The building is still too high and has not been reduced in height as you say. There must be a 6pm curfew on the use of terraces. All deliveries should take place from Moorfields. This is a non-residential street and is only busy at rush hour. This road could be adapted and a pedestrian crossing could be added. This is crucial. Moor Lane already has delivery entrances for City Point and Deutsche Bank. There is constant beeping and exhaust noise 18 hours per day. Noise is a huge issue in this area. Bedrooms are located on Moor Lane. These are peoples homes and we deserve to have a suitable environment. We know it is the city centre, but businesses can mitigate, if they want to. The windows to 'Tenter House' should be factory fitted with solar blinds, otherwise the use of blinds fitted within the building will never be used properly and they will get damaged. Ideally they should be controlled electronically. The plan to have a community space not managed by the building owners is a huge issue. There will be no control and management of this area and

noise and anti social behaviour will be nobody's responsibility. The residents will suffer. If you have catering outlets in the building you must provide adequate litter disposal facilities and closing hours must be as per requirements in residential areas.

From:
To:
Subject: Tenter House Planning Application Objection - 24/00209/FULMAJ
Date: 27 September 2024 12:21:03

THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam

I am writing to object to the revised plans for Tenter House.

We live in 522 Willoughby House, Barbican, EC2Y 8BN which is directly opposite the proposed site for the demolition and rebuilding of Tenter House.

The initial plans meant that we would lose the sliver of morning sunlight because of the larger building. The revised plans (presumably a well-worn method of achieving what they wanted in the first place) means the addition of three more floors and an increase in size of the whole building to an unacceptable 21 storeys.

Moreover the proposed balconies facing south and west mean that our bedrooms will be overlooked.

Following on the heels of the Deutsche Bank development the traffic in Moor Lane has increased and the Tenter House development will mean even more traffic, during the construction and service afterwards with more bleeping lorries from 6:30 in the morning.

For over twenty years we have been surrounded by building sites and the construction of enormous buildings. They have cumulatively caused an unacceptable increase in noise, traffic and loss of privacy.

Yours faithfully

Dr NJ and Mrs SP Astbury
522, Willoughby House
Barbican
EC2Y 8BN

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Dr Michael Swash

Address: 106 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I appreciate the work that has gone into the application and have no generic objection to a rebuild on the Tenter House site. However, the currently submitted plan has a number of important problems, especially from the viewpoint of a resident near-neighbour, just across Moor Lane, directly to the west of the new building.

1. Moor Lane is a narrow street, designated as a major cycle route, that is already subject to increasing traffic as a short cut, and to service Deutsche Bank, a building not yet fully operational. There is not sufficient spare capacity to allow more service vehicle to access Tenter House through New Union St.

Please remember that Moor Lane is designated as a Health Neighbourhood Scheme, shortly to be enacted by the addition of 'greening' - increased traffic is therefore contraindicated.

2. All motorised access should be via Moorfields - connecting to New Union St from the east. The developer should thus reinstate the access that is planned to be removed (originally to an

underground car park that is no longer included in the plans). Loading bays should be internalised within the new building, including turn around space (as for Deutsche Bank). Turning vehicles emit loud 'beeps'.

3. The new building is much too tall - it will dominate residential accommodation in the City's much admired Barbican Estate, cutting off lights to eastern properties, especially in Willoughby House. Simmonds and Simmonds kept their rebuilt offices to a reasonable height, and Tenter MUST do likewise. Move the tower eastward.

4. The addition of balconies in the sky overlooking our bedrooms in Willoughby is thoughtless and, frankly, obnoxious. All Willoughby bedrooms face directly onto Moor Lane and therefore toward Tenter House. Currently, of course, Tenter House is invisible from Willoughby.

5. Nocturnal Light Pollution from lights left on all night is a perennial problem, and automatic blinds soon cease to function. Strict regulation with appropriate penalties please.

From:
To:
Subject: Tenter House Planning Application Objection - 24/00209/FULMAJ
Date: 28 September 2024 16:37:47

THIS IS AN EXTERNAL EMAIL

Objection to Planning Application Ref: 24/00209/FULMAJ

Redevelopment of Tenter House 45 Moorfields London EC2Y 9AE

Objection Letter submitted: 28/09/24

I am writing to object to the revised proposals for redevelopment of Tenter House (45 Moorfields London EC2Y 9AE). I previously submitted an objection to the proposals submitted in February 2024, on grounds of Noise and Disturbance. Unfortunately, the latest amendments do nothing to mitigate these issues.

OBJECTION TO SERVICE DELIVERY PROPOSALS

I live in Willoughby House. My bedroom window faces onto Moor Lane, and I am located directly opposite the junction of New Union Street and Moor Lane. All of the windows on this side of Willoughby House, facing directly onto Moor Lane are to bedrooms (147 flats in total). Many residents have children. The current planning application proposes that all vehicular servicing will access the development via Moor Lane and New Union Street, with egress onto Moorfields.

The amended proposal estimates a potential 81 deliveries per day, compared with 88 in the February application. However, this still represents an increase of 14 per day over the previously consented scheme for the site (September 2020). What is worse is that a significantly higher proportion of these are anticipated to be HGV (3 or 4 axle) large lorries. **In 2020 it was estimated that there might be 3 HGV deliveries per day.** In the current reports **this has increased to 10 HGVs per day.** There is currently inadequate space within the proposed service yard for larger lorries to turn so they will have to reverse in, with resultant loud bleeping and “reversing lorry” announcements.

Moor Lane is currently subject to traffic management procedures, with the road closed to the south between 11pm and 7am Monday to Friday, in recognition of the fact that it is a residential location. How can it be appropriate to encourage commercial traffic to Tenter House during these hours.?

Given this setting, I am particularly alarmed by the statement (Para 7.6 of “Delivery, Servicing and Waste Management Plan”, dated February 2024.), which proposes “...*deliveries being undertaken before 6:30am and after 10pm to ease the number of deliveries during the peak daytime hours*”

I note that there is an undertaking to implement a “consolidation” of deliveries to reduce the number of trips. However, how will this be enforced, and might it not potentially result in an increase in size of vehicle used?

The argument for retaining a 'one-way' limitation on New Union Street appears to partly stem from the proposal in the current application to "pedestrianise" it and improve access for both cyclists and pedestrians. The images show it as a shared surface with adjacent café seating in Moorfields. Whilst this might improve the visual appearance of Moorfields, I think that this strategy is ill-conceived. The reality of a service route with 80+ delivery vehicles per day (plus those servicing City Point) in a tunnel under a 14 storey building, sloping steeply down to basement level is hard to reconcile with the proposed conceptual treatment. The remaining portion of New Union Street (outside the scope of this application) is of a completely different character. Surely a more efficient and realistic proposal would be to direct pedestrian and cycle traffic through the enhanced City Point Plaza, linked through to a pleasant (quiet) tree lined Moor Lane at the rear. New Union Street could then work harder as a two-way managed service route, visually screened (Gated?) at the Moorfields end.

I strongly urge you to consider the following amendments / conditions to any approval:

- All access and egress is 2-way, via Moorfields and not via Moor Lane (at least for larger vehicles and early morning /late evening traffic). New Union Street to be designed to accommodate this.
- Redesign of the delivery area to include an in-out route that avoids the need to reverse (and the resultant high-pitched bleeping noises).
- Any vehicular access via Moor Lane to use smaller / quieter vehicles only (electrically powered, cycles etc)
- Robust conditions to ensure that any approved management /consolidation strategies are enforceable, designed in from the outset, and not reliant on employment of additional-site management staff in perpetuity.

OTHER ISSUES OF CONCERN:

Proposed Balcony / terrace usage:

I note that a large terrace is still proposed - similar to the consented scheme, but at a higher level with increased potential for overlooking. There are also additional balconies on the elevation facing Moor Lane. Please ensure that the same planning conditions will apply as per the previous consent (to both terraces and balconies):

- *Condition 25 (Sept 2020): Roof terraces hereby permitted shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency.*
- *Condition 26 (Sept 2020): No amplified or other music shall be played on the roof terraces.*
-

Light pollution:

Bedrooms on Moor Lane are currently very affected by light pollution from adjoining offices – e.g. City Point where lights are regularly left on all night and blinds are not used. This also results in an enormous waste of energy and is surely contrary to COL sustainability initiatives.

The only way to address this appears to be to design in a solution from the outset. PIR operated systems are unpopular with staff and do not appear to work long-term. Have any other planning conditions proven to be successful? How will this issue be addressed in the design of the new Tenter House? Has any consideration been given to the inclusion of automatically operated black-out blinds as a mandatory design feature.

From:

Sheelagh McManus,

518 Willoughby House EC2Y 8BN

Flat 518, Willoughby House
The Barbican
London
EC2Y 8BN
United Kingdom

28 September, 2024

Environment Department
City of London
PO Box 270
Guildhall
London EC2P 2EJ
United Kingdom

SUBMITTED BY EMAIL TO: plncomments@cityoflondon.gov.uk

Dear Madam/Sir

[REDACTED]

The developer has submitted revised proposals for this project. I am a local resident living at Willoughby House, my flat overlooks Moor Lane directly opposite the junction with New Union Street and facing the west elevation of the revised Tenter House planning application. The updated proposal will have a negative bearing on my quality of life. As a consequence, I would like you to consider my objections. These are:

[REDACTED]

The revised application shows the developers decision to remove the ramp access for car parking and some deliveries from Moorfields. This now means all traffic will be routed via Moor Lane to New Union Street exiting onto Moorfields. In addition, the increased volume of the building is expected to account for 20 more delivery lorries per day, this total of over eighty will include up to 10 large HGV movements with consequential increase in noise and air pollution. I do not believe it is reasonable to route these deliveries directly past my bedroom windows on Moor Lane.

The proposal outlined in the Design and Access statement describes the pedestrianisation of New Union Street whilst at the same time re-directing all delivery vehicles through this route. This layout which requires large vehicles to carry out complex manoeuvring (also illustrated in the Design and Access statement) appears both disingenuous and dangerous.

Moor Lane is currently subject to traffic management procedures in recognition of the residential location. It forms part of a Health Neighbourhood Scheme and is to be planted next year. It forms a designated route for cyclists heading north/south. I am a cyclist and use the cycle route on Moor Lane. Existing delivery traffic to City Point using the constrained turning to New Union Street currently requires exceptional care to negotiate. I do not believe it to be safe or appropriate to encourage an increase in commercial traffic to the Moor Lane / New Union Street junction.

I would like you to consider the following amendments / conditions applied to any approval of the current application:

Delivery vehicle access and egress should be 2-way and via Moorfields.

- Redesign of the constrained delivery area to include a turning circle for the largest anticipated commercial vehicle and an in-out route that avoids the need to reverse (with the resulting high-pitched sound alerts amplified at Moor Lane by the canyon-like acoustics of New Union Street).
- Vehicular access via Moor Lane to be used only for quieter and less polluting vehicles such as e-bikes, cycles etc.

Height and bulk:

The west elevation viewed of the proposal from my bedrooms, is substantially higher and wider than the consented scheme (2020). There are more balconies on the west face. This will mean overlooking. It may have an impact on daylight and a likely increase to artificial light pollution. The proposed terrace is also higher and more prominent as a result.

I would like you to consider the following amendments / conditions applied to any approval of the current application (some of which apply to the already consented application):

- Terraces must be closed at the end of normal working hours (6pm). There should not be exceptions for bank holidays or weekends.
- No loud noise generating activities (amplified music, commentary, speech, etc.) should be permitted on the terraces.
- No distracting light displays (large screen video displays, lasers lightshows, etc) should be permitted on the terraces.
- Automated blinds must be required for all windows on the west elevation.
- The daylight / sunlight calculations should be independently verified.

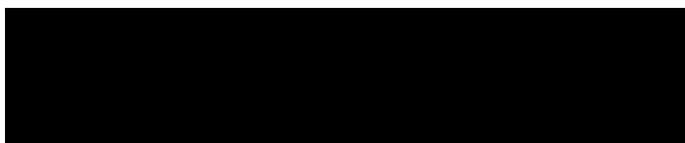
Community Space:

The proposal includes for the provision of a community space on the ground floor opening onto City Point Plaza. As a local resident and member of the community, I have a direct interest in the success of this element of the proposal.

I would like you to consider the following amendments / conditions applied to any approval of the current application:

- The space should be fully furnished and fitted out as part of the consent.
- The approval should require an undertaking to fund the promotion and facilities / operational management of the space for a reasonable period of time. For example ten years from the point of availability.

Sincerely

A large black rectangular redaction box covering the signature area.

Christopher Shaw

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Mrs Katherine Jarrett

Address: 504 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: We submitted an objection to this proposed plan on 07/05/2024 at 15:23 REF. 24/00209/FULMAJ however due to a change in outlined date we were unclear as to whether that objection would be considered, so are re-submitting our objections with additional clarification.

Specifically with regards to the amended plans we would like to object to:

- 1) Light: The proposed revised massing of the building and the associated impact on our right to light.
- 2) Noise / Peaceful enjoyment: our bedroom is on Moor Lane. The proposal for terraces would unfairly impact on our peaceful enjoyment of our property in the evenings / weekends. The terraces should close at 6pm.
- 3) Noise: Real concerns about loading bays - servicing and deliveries should be from Moorfields

not Moor Lane.

4) Embodied carbon: the new scheme should account for the release of embodied carbon.

5) Overlooking / Residential amenity: Automated blinds should be installed in the new Tenter House development's south and west facing windows.

We also previously submitted an objection to 17/0150/FULMAJ.

Many thanks for your consideration - we love our home and feel very strongly about the proposals.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].
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Case Officer: Amy Williams

Customer Details

Name: Keith Webster

Address: 50 Speed House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Traffic or Highways

Comment: This application fails to make sufficient allowances for the fact that it is adjacent to a residential area.

The increased size of the replacement building means the additional traffic both during construction and once built will be significant. It is important that the noise and flow from that traffic is kept away from the residential area by being routed via Moorfields. Vehicle turning and reversing also needs to be well away from the residential area, ideally within the building.

I also believe insufficient consideration has been given to the environmental impact of the proposed destruction of the current building and construction of the replacement. The carbon emissions from the project are being those the City should find acceptable.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

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Case Officer: Amy Williams

Customer Details

Name: Ms Nicola Guereca

Address: Flat 113 Willoughby House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I wish to register my objection on the grounds of light loss. I am concerned about the impact this will have on my property in terms of loss of light. The revised development proposal would cause a materially greater impact upon the light to my property.

From:
To:
Subject: Tenter House Planning Application Objection - 24/00209/FULMAJ"
Date: 30 September 2024 10:00:56

THIS IS AN EXTERNAL EMAIL

I am very concerned by the proposed amendments to the Tenter House scheme (notably the increase in scale and density) and wish to object for the following reasons as the revision has not taken into account the views of nearby residents

I will be living next door to this huge development and the following issues need to be considered and changes made please :

- . Unacceptable height (this impacts WH and other areas of the Barbican)
- . Terraces must close at 6pm and no use of them at weekends or bank holidays and no exceptions
- . Servicing and deliveries must be from Moorfields. The traffic on Moor Lane is already at dangerous levels and the noise impact on residential amenity significant
- . Loading bay needs to be big enough for vehicles to fully turn around in
- . Automated blinds to be fitted to west and south facing windows
- . Community space should be funded, managed and controlled
- . Daylight/sunlight calculations need to be independently verified; and
- . The release of embodied carbon should be accounted for

Key issues

Service Yard

The developers have increased the height from 11 storeys to 21, this would increase the deliveries and servicing. It is therefore the responsibility of the developer to change the internal design.

Bleepers from reversing vehicles onto New Union Street would be a serious noise nuisance to Barbican residents. The CoL white noise bleepers are not mandatory. Bleepers already cause disturbance from 630am!

. TRAFFIC PLAN

For all of the reasons below it is CRITICAL that the service yard design is amended to be large enough for all vehicles to turn inside the yard.

Why should the residents along Moor Lane be disturbed by more traffic noise nuisance because of choices made by developers and their architects?

When the 21 Moorfields building service yard was moved from Fore Street Avenue to Moor Lane the service yard was increased so that all vehicles can turn and drive out. Even so there was a significant increase in traffic and noise

The Tenter House architect has decided to remove the ramp from Moorfields down to a car park and delivery area in the current building and the developers have made the decision to double the height of the building, both these decisions would cause increased delivery and servicing traffic

Willoughby residents are told that all deliveries and servicing are strictly regulated and spread out during the day, un-booked ones turned away, banks men on duty –if so then again there should be no problem in having deliveries from Moorfields as it only busy for relatively short periods of time with commuter traffic and this has been confirmed by survey data

Moor Lane will form part of the Health Neighbourhood Scheme and the much awaited greening scheme is scheduled to start in a year's time

Moor Lane is already besieged with deliveries and servicing and is on the north south cycleway. It's full!

New Union Street is supposedly one way but the short distance to the servicing yard does not need to be

There is a SOLUTION to noise disturbance: all vehicles travel in from Moorfields into New Union Street with their strict regulated system.

TERRACES & AUTOMATIC BLINDS

No less important are the issues of terrace usage and installation of automatic blinds. This can easily be solved by 2 appropriate conditions.

- . the limiting of time on terraces

Terraces must close at 6pm and there must be no use of them at weekends or bank holidays (with no exceptions)

- . Light spillage

A condition to require automatic blinds to stop light spillage. This needs to be included at this stage as no-one takes responsibility at the fit out stage and the automatic switch off systems do not work

Please take these important points on board and moderate the impact on

local residents

Regards

Ian Williams
111 Willoughby house

Sent from my iPad

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Mr John Holme

Address: Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: Servicing and deliveries cannot be via Moor Lane, Fore Street or Wood Street. Vehicle traffic on these streets is already too high (and note they have a high level of pedestrian footfall, which does not mix well with heavy vehicle traffic) - and those streets are in any event a key focus for traffic calming (and no/limited access) measures already as part of the Healthy Neighbourhood Scheme (in its near final stages).

Servicing and deliveries should therefore be via Moorfields and Moorgate instead, which is a far safer, more established, and easier access point.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

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Case Officer: Amy Williams

Customer Details

Name: Sian Phillips

Address: 52 Speed House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Traffic or Highways

Comment: Planning Application Comment: Application Reference 24/00209/FULMAJ

I wish to formally express my objections to the revised planning application submitted by the developer. While some modifications have been made, many significant concerns raised by Willoughby House Residents remain inadequately addressed.

Key Issues:

Height and Scale: The proposed increase to 21 storeys and the addition of another tower are unacceptable. This change adversely impacts Willoughby House and obstructs views of St Paul's Cathedral from the river.

Terrace Usage: The balconies on the southern and western façades pose privacy concerns. I

strongly urge that conditions be set to limit terrace use to weekdays only until 6 PM, with no use permitted on weekends or bank holidays to mitigate disturbances.

Service Yard and Traffic Concerns:

Service Yard Size: The current design of the service yard is inadequate. It is essential that it is large enough for all vehicles to turn around within the yard to minimize traffic disruptions on Moor Lane.

Traffic Plan: Accessing the site solely from Moor Lane exacerbates existing traffic issues. This plan fails to consider the impact on residential amenity and public safety, especially with the anticipated increase in deliveries due to the building's height. The service yard should follow the successful model established at 21 Moorfields, where vehicle access was efficiently redesigned.

Noise Disturbance: The noise generated by reversing vehicles and general servicing activities is already a concern for Barbican residents. I urge that the use of noise-reducing beepers be mandated to lessen disturbance, particularly during early morning hours.

Light and Daylight Impact: The daylight and sunlight calculations need to be independently verified, as preliminary checks suggest inaccuracies. The cumulative impact of this development on existing properties has not been adequately considered.

Community Space Management: Any proposed community venue should be properly funded and managed to ensure it serves local needs without negatively impacting nearby residents.

Automated Blinds and Light Spillage: To prevent light pollution, I recommend that all west and south-facing windows be fitted with automated blinds. Additionally, specific conditions should be included in the planning to address light spillage, ensuring responsibility for compliance during the fit-out phase.

Conclusion:

While I appreciate the efforts made to revise the original plans, the concerns of Willoughby House Residents must be taken into account. I urge the planning committee to thoroughly assess these issues and require the developer to make necessary amendments to the proposal.

Thank you for considering my comments.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Ms Jo Bradman

Address: Flat 59, Speed House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: My objection relates particularly to the servicing of the building and its impact on residential amenities.

The plan seeks to route servicing vehicles down Moor Lane, which will adversely affect all neighbouring properties and which has not previously been the case with Tenter House. I seek a return to servicing vehicles approaching from Moorfields, which is not residential. The service yard seems from the plans to be too small for vehicles to turn, which would result in reversing vehicles, causing further noise issues to surrounding properties. The service yard should enable vehicles to turn inside the yard and drive out forwards.

Another objection concerns terraces which overlook bedrooms of neighbouring properties. Access to these should be limited to avoid access (and therefore noise and light disturbance) during

evenings (say, after 6pm) and weekends.

My final objection is to the scale of the proposed building. The proposed building is vastly bigger in all dimensions than its predecessor. This will adversely impact on access to daylight and sunlight to neighbouring residential properties during the day, and adversely impact through light pollution during the night.

Thank you.

From: Michael Friel

Sent: Monday, September 30, 2024 6:48 PM

To: PLN - Comments

Subject: Tenter House Planning Application Objection - 24/00209/FULMAJ

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madame,

As a Barbican resident living next door to this development, I wish to object to the proposed planning application. I do not object to sensible developments, the city has many great examples. However this application seems senseless in the present economic and office space environment.

The building should have been repurposed, on current rates Buckingham Palace will be next for demolition and redevelopment!

The Tenter House application has poor access points for deliveries. The traffic and noise is horrendous at the moment. I hate to imagine what it will be like after this development.

There is no need for additional recreational bars and restaurants in the building.

There is a lack of loading bays for delivery vehicles to turn.

The building's terraces will tower over Barbican residents flats with no privacy.

There needs to be a community spacer rather than the current practice of office building perimeters right up to the pavement. Narrow pavements are a hazard for all.

I would ask you to reconsider this application and make a better effort to make the development more sustainable. Think if it does not work as an office, it could be repurposed easily to residential accommodation.

Thanking you.

Kind regards,

Michael.

--

Michael Friel MPharm PhD

|

From:
To:
Subject: Tenter House Planning Application Objection - 24/00209/FULMAJ. Objection
Date: 01 October 2024 12:13:30

You don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

I wish to object to the above referenced planning application.

Noise/Traffic/Residential.

The proposal is to increase the footprint and height of Tenter substantially. This will inevitably increase the numbers of delivery and other vehicles frequenting the building. Willoughby House overlooks Moor Lane and the majority of rooms that face down on to Moor Lane are bedrooms, whilst others will be home working spaces. It is simply unacceptable for those vehicles heading to and from Tenter House to be routed through Moor Lane. Moor Lane is subject to a greening scheme and it forms part of the Healthy Neighbourhood scheme. All vehicle movements should be routed directly from Moorfields into New Union Street and kept away from Moor Lane.

Noise/Traffic/Residential.

The developer and architect have made no provision for increasing the size of the vehicle turning circle within the loading bay, which should be positioned within the building. As mentioned above there is going to be a sizable increase in delivery and other vehicles. The proximity of Tenter House to Willoughby House, the latter of which is a residential block, means that without adequate provision to address the vehicle turning circle issue, residents of Willoughby will be constantly bombarded with the noise pollution from beepers resulting from vehicles turning/reversing. .

Light Pollution.

Nighttime light pollution is a big issue to residents of Willoughby, particularly as it is primarily bedrooms that overlook Moor Lane and the adjacent office blocks. All windows within the proposed Tenter House building must come with automated blinds fitted as standard

Noise/Residential

It appears that provision has been requested for a community space within the Tenter House building. It needs to be made clear that responsibility for managing all spaces, including the community space within the building, must fall to the Managing Agent. Unacceptable noise and antisocial behaviour must be managed and promptly addressed by the Managing Agent.

Noise/Residential

Strict controls must be in force relating to the usage of terraces/balconies. The plans show these will be directly overlooking Willoughby House and its residents. They should only be operational between Monday to Friday and must close by 6pm. No openings should be allowed over weekends and bank holidays.

Health & Safety

Does Tenter House have asbestos? If yes, do the developer and Corporation of London Planning have a duty of care to those persons resident within proximity of the demolition. What means of communication is being made to the residents?

Right to Light

Many of the properties within Willoughby will be impacted by the loss of light resulting from the sizable height increase in the proposed new building. All calculations relating to the loss of light must be independently verified.

Thank you,

Petre Reid

524 Willoughby House
Barbican
EC2Y 8BN

From:
To:
Subject: Tenter House Planning Application Objection - 24/00209/FULMAJ
Date: 01 October 2024 15:38:05

THIS IS AN EXTERNAL EMAIL

Dear Planning Team,

Please accept this email as an objection to the above Tenter House Planning Application.

As a resident of Speed House, the primary objection is the routing of construction traffic via Silk Street, which can be avoided.

Kind regards,

Andrew Watts RIBA
40 Speed House
Barbican EC2Y 8AT

From:
To:
Subject: Tenter House planning application objection ref:24/00209/FULMAJ
Date: 01 October 2024 17:26:26

THIS IS AN EXTERNAL EMAIL

I am objecting to the above planning application on the following grounds:

I live at 516 Willoughby House Barbican EC2Y8BN

My bedroom directly faces Moor Lane and the proposed Tenter House development ,

Traffic on Moor Lane is already at a dangerous and congested level with drivers constantly hooting and swearing in frustration at the delays with vehicles beeping as they have to reverse .Thus all deliveries / servicing to Tenter House must be through Moofields .

Following on from the above point the loading bay at Tenter House must be large enough for deliveries to turn around, again to reduce noise pollution when reversing .

As well as noise pollution there is danger of light pollution disrupting sleep so all windows on West and South sides should have automatised blinds.

Proposed balconies and terraces overlook the bedrooms of Willoughby House , thus I insist that they close at 6pm on all days without exception allowing young children, shift workers and vulnerable adults to use their bed rooms in privacy and quiet ,

Susan Gilbert

Sent from my iPhone

From:
To:
Subject: Tenter House Planning Application Objection - 24/00209/FULMAJ
Date: 01 October 2024 18:43:10

THIS IS AN EXTERNAL EMAIL

I write to express my objections to the revised plans for Tenter House; I was unhappy with the previous planning application but as a City of London and Barbican resident, I am particularly concerned at the over provision of new office space and also the effect of this particular development on the Barbican and specifically – as a resident of Speed House – of the additional traffic movement on Silk Street and Moor Lane not only during construction but subsequently. I make this objection in the knowledge that there are more applications in the pipeline to demolish and rebuild that will use the same streets and will directly affect me.

From what I have gathered from the revised planning application, it is proposed to

1. increase by 3 storeys to 21 floors as well as the overall size of the development with an additional tower
2. Construct balconies along the length of the southern façade of the top floor and the western side, both will be overlooking my neighbours in Willoughby House. I don't think the proposed mitigation measures will be adequate and bearing in mind the saga with Tate Modern I would think might be turned down by judicial review
3. Provide what is termed a 'community venue' on the ground floor with direct access from City Point Plaza about which I feel less strongly but will clearly add to footfall and need to be reviewed in conjunction with other proposals to add more retail to the area immediately surrounding the residential Barbican Estate

In sum these are choices to maximise the potential revenue of the building which come at the expense of the residential community and indeed other stakeholders and, apart from any other issues, could well decrease the desirability of what is in effect a premium area. I would hope that, at the very least, the revisions are rejected and a more appropriate set of solutions to the acknowledge problems sought. These involve both mitigations during the construction phase and an overall consideration of what the area as a whole will look and feel like as a result of this and other current proposals some of which have not yet been formally submitted but are well known to officers.

Yours truly,

Professor Tim Butler
97 Speed House

Ms Amy Williams
City of London PO Box 270
Guildhall
London EC2P 2EJ

1st October, 2024

Dear Ms Williams,

Objection to SCHEME AMENDMENTS to planning application 24/00209/FULMAJ for the demolition and building at Tenter House, 45 Moorfields, London, EC2Y 9AE

I object to this development on the grounds of sustainability, massing/overbearing, building height, daylight/sunlight, townscape, inadequate traffic/servicing and damage to amenity for neighbouring residential occupiers.

The revisions to this application still result in a “tall building” which the Mayor of London (and therefore City of London emerging planning policy) says is unsuitable for this location. The revisions still result in damage to the views of St Paul’s Cathedral, which are supposed to be protected even from small-scale encroachment, without suitable mitigation to make it acceptable.

The resulting roofline along Moor Lane is a mess, affecting the setting of the listed Barbican and the Conservation Area.

Consultation was not done at all on these revisions and my comments were not taken into account in the design evolution.

In particular I object to;

- i) The WLCA which excludes the carbon associated with demolition
- ii) The size/scale of the scheme, which is still too high
- iii) Traffic and servicing arrangements, which need to conform with the Local Plan by including an internal place for vehicles to unload and turn around
- iv) Loss of daylight and sunlight due to the excessive height of the development.
- v) Noise pollution from the roof terraces, which need to close at 6pm with no exceptions
- vi) Light pollution from artificial lighting at night, which needs windows with integral automated blinds

Pretending that there is no carbon impact because demolition occurs under another planning consent is a nonsense and makes a mockery of the City’s “retrofit first” claims.

The scheme is still three storeys higher than the 2020 consent; still breaches Mayoral policy and emerging City policy; still interferes with views of St Paul’s Cathedral; still damages amenity for neighbouring homes, especially by being wider at the top as well as higher than the 2020 consent.

Neighbours were not shown the daylight/sunlight impact of these scheme amendments. Not only should a fully independent assessment be required; this should also be shared with affected property owners, with allowance for further objections before any decision is made.

To safeguard amenity under the Local Plan (DM15.7, DM21.3), terraces overlooking should be limited by condition to restrict use after 6pm on weekdays, and none at all on weekends and Bank Holidays, as with the London Wall West application which said (condition 41) that: “*The roof terraces hereby permitted shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency*”.

Deliveries to Tenter House, from the residential street, Moor Lane, will damage amenity for residents and pose a danger for cyclists using the strategic cycle route on the street. As the servicing yard is not big enough for vehicles to turn around there will also be noisy reversing. This contravenes the City’s current plan policy DM 16.5. In the 2020 scheme, the planning department insisted on a servicing yard big enough for lorries to turn round and publicised this particular aspect of the consent. The same should apply to this application; as the 2020 scheme is being used as a precedent in other matters, consistency and fairness demands that it should apply to servicing, too.

Conditions should also require window units with integral blinds to drop automatically at 7pm to stop the high level of light pollution adversely affecting “light-sensitive” homes next to the scheme – in line with the City’s Lighting SPD.

Yours sincerely

E Hirst

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Mr Nigel Gilbert

Address: 314 Gilbert House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Traffic or Highways

Comment: Moor Lane sits between Willoughby House and the retail /office buildings on the other side of the road.

With the significant increase in the size of the building in this proposal, the volume of delivery and despatch traffic needed to service it will increase in proportion so if the delivery access to Tenter House is in Moor Lane it will increase the disturbance to the residents and the traffic using Moor Lane and Fore Street which has already been impacted by the 21 Moorfields project.

Placing the delivery entrance in Moorfields between two rows of commercial property would eliminate this, retaining the relatively quiet flow of traffic via Wood street /Fore Street/ Moor Lane and retain the quiet junction between Silk Street and Moor Lane in front of the Guildhall School of Music.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

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Case Officer: Amy Williams

Customer Details

Name: Mr Louis Gilbert

Address: 516 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity
- Traffic or Highways

Comment: Dear Sir

I am a leaseholder of 516 Willoughby House, almost directly opposite the Tenter House site on Moor Lane. The bedroom window faces east towards the Tenter House site.

I'm objecting to the proposed planning application on the following grounds.

The revised plans are unsympathetic to the local community namely the unacceptable height that will impact Willoughby House and Views of St Paul's from the River Thames.

The proposed terraces must close at 6pm and be permanently closed on public holidays and weekends with no exceptions to safeguard the privacy of sleeping areas in Willoughby House.

Services and deliveries to the new development MUST be made via Moorfields a wholly

commercial street, Moor Lane is heavily residential with the Heron and Barbican Estate Blocks overlooking the already heavily congested Moor Lane , with daily parking infringements already occurring with little to no control from the City, this road is at capacity and unable sustain further heavy site traffic.

The loading bay must be large enough for vehicles to turn around inside this eliminating the traffic congestion and noise on the exterior of the building.

The proposed community space must fully funded for a minimum time going forward to ensure its survival as a community venue. It must be managed in considerate and ethical way that enables the space to work, and have a designated operating time such as the adjacent commercial units. The term 'community' is a very loose term and the space must be protected for the local community at appropriate fees, there is a huge risk of it becoming more of a commercial space under the guise of community space as a planning sweetener to local residents, who over time will not benefit from the space due to high usage fees.

Automated blinds must be fitted to the west and south facing windows to safeguard the privacy of residential neighbours.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

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Case Officer: Amy Williams

Customer Details

Name: Henrietta Wells

Address: 119 Willoughby House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: While I am in favour overall of the redevelopment of the Tenter House site, the plans as proposed are unsuitable as follows:

- The building is too tall and has too much mass at height. It will result in considerable loss of light for those in Willoughby House;
- The building terraces are proposed to be used a few times a year in the evenings after 6pm. This will cause unnecessary disturbance for residents whose bedrooms are overlooked by the proposed terraces. There should be no use of the balconies at all after 6pm;
- All windows facing towards the north, west and south must have integrated blinds that close at sunset, to prevent nighttime light pollution for nearby residents;
- The proposal for the building loading bay to be accessed from Moor Lane will generate unacceptable noise and traffic along this street, which is already busy. It will also result in friction

with vehicles delivering to City Point, which already use Moor Lane. The access to Tenter House should be from Moorfields, and the loading bay should be large enough to permit vehicles to turn inside to prevent noise from reversing "bleepers".

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

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Case Officer: Amy Williams

Customer Details

Name: Mr Bernard Hughes

Address: 107 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity
- Traffic or Highways

Comment: I live on Moor Lane and my bedroom faces the proposed service entry. I am objecting because there is lack of consideration as to how this very large building - much larger than existing planning permission - will sit harmoniously alongside its neighbours. The building is too tall - surely CityPoint Plaza will be thrown into darkness and this greater scale will place huge strain on the already busy Moor Lane - damaging residential amenity. Rooms facing the tower will have darkness - one of my 1st floor neighbours hasn't received any contact on light loss to her flat. Something has gone awry with the light calculations and they must be independently verified before real mistakes are made.

The scheme needs to be more aware of residential amenity eg automated night blinds are key Servicing must be away from residents and the cycle path of ML and via Moorfields - vehicles must turnaround inside the building .Why should residents suffer through a design choice? We had beepers on Moor Lane at 610am today. Deliveries persistently arrive very early on ML and

idle : all parking on ML must be reviewed in light of this scheme

There is an arts space: access must be via the reception area for control and management. Who will be liable for what takes place in the venue?

Balconies facing us must shut at 6pm and weekends and have dense foliage to protect privacy and to cut noise.

The scheme is too big and there is a lack of care to the amenity of those nearby Improvements must be made. I've no ill will against the developer or comment on the style of design other than scale and servicing.

To whom it may concern,

Please find an objection to the below referenced planning application as recently amended.

| | |
|------------------|--|
| Reference | 24/00209/FULMAJ |
| Address | Tenter House, 45 Moorfields, London, EC2Y 9AE |
| Proposal | Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION]. |

I am the leaseholder of 601 Willoughby House, a neighbouring residential property directly impacted by this application.

I have made a previous objection to the original 2024 Proposal ('Submitted Scheme'), which still stands.

The grounds and details of the objection to the amended proposal ('Addendum Scheme') are as follows:

Residential Amenity: Impact of Loss of Light to Residential Dwellings (Willoughby House)

The 2020 Permission extends to 87.9m AOD, whilst the Addendum Scheme extends to 95.2m - over seven metres higher.

The detrimental impact of this height increase on daylight to Willoughby House, including my own flat, is significant.

The table below uses data from the application to illustrate this. It compares NSL 'lit areas' between the baseline 2020 Permission and the Addendum Scheme.

As a means of illustrating the difference in impact between the two schemes, the data for 'Room 35' is shown for each floor. I understand that Room 35 on the 6th Floor falls within my property.

| | 2020 Permission / NSL sq ft | 2024 Addendum Scheme / NSL sq ft | Reduction in NSL |
|--------------------|--------------------------------|--|------------------|
| Room 35, 1st Floor | 52.4 | 39.9 | 23.9% |
| Room 35, 2nd Floor | 56.8 | 44.0 | 22.5% |
| Room 35, 3rd Floor | 61.0 | 48.0 | 21.3% |
| Room 35, 4th Floor | 68.0 | 55.0 | 19.1% |
| Room 35, 5th Floor | 72.4 | 55.7 | 23.1% |
| Room 35, 6th Floor | 76.1 | 62.6 | 17.7% |

In the case of the 1st floor room, the 2024 Proposal (both original Submitted and Addendum) take the NSL to under 30% of the room's area. All rooms considered see a substantial reduction in both NSL and VSC versus the 2020 Permission.

The impact on some rooms in Addendum Scheme is in fact even greater than the original 2024 Proposal ('Submitted Scheme'). The applicant's own report further confirms this by stating the Submitted Scheme had only 192 of 231 rooms NSL in compliance with BRE guidelines, but the Addendum Scheme has even lower compliance.

The data simply does not support the applicant's statement '*whilst the Proposed Development will give rise to some minor reductions in daylight and sunlight to Willoughby House these reductions are considered to be so minor as to be unnoticeable*'.

Given the material negative impact evidenced by the applicant's own data, allowing the >7m increase in height would seem inconsistent with the the City of London Local Plan policy statement '*to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels ...*'.

The proposed 2040 City Plan further notes '*The amount of daylight and sunlight received has an important effect on the amenity of dwellings... Access to appropriate levels of daylight and sunlight is important for the mental health of workers and residents.*'

In summary, both the Submitted and Addendum Scheme cause material and unacceptable loss of light, over and above the 2020 Permission.

The applicant attempts to gloss over this loss of light by blaming it on what it calls 'private amenity balconies', but which are in fact the fire escapes of Willoughby House. The fire escapes are a key functional feature of a listed development, which has existed over 50 years. Such attempts to blame loss of light from a new development on them are disingenuous to say the least.

In any case, the loss of light impact of the increased height / additional storeys over the 2020 Permission profile could be significantly mitigated if the applicant moved such mass exceeding this profile eastwards to the Moorfields side of the building.

Noise / Traffic & Highways: Impact of Increased Service Traffic to Residential Dwellings (Willoughby House and 5 Moor Lane) & Vulnerable Road Users / Pedestrians

The Submitted and Addendum schemes envisage a large amount of service traffic entering the proposed building via Moor Lane.

The increased traffic will cause inevitable loss of amenity due to noise impact to the residential dwellings in Willoughby House and 5 Moor Lane, including my own. This will be amplified by the canyon effect, given the road is already bordered by tall buildings. There is also risk of noise impact from reversing alarms to the same dwellings if vehicles are not given space to turn within the proposed building and are expected to reverse out on to New Union Street.

Furthermore, increased traffic if routed from the north, may create conflict / increased hazard to pedestrians crossing Moor Lane on the natural route from Moorgate Station to the Barbican Arts Centre, as well as for the many cycle commuters who use the route (Moor Lane forming part of the C1 Cycleway route).

Moor Lane is already frequently lined by commercial vehicles stopped on both sides of the road (often contrary to road markings), dramatically impinging on visibility for crossing pedestrians of oncoming vehicles, and for oncoming vehicles of pedestrians attempting to cross (including at the pedestrian crossing). Additional service traffic would only make this situation more hazardous for pedestrians and vulnerable road users.

Finally, routing traffic along Moor Lane seems to oppose the spirit of the City of London's previous proposals 'to create greener, biodiverse and environmentally resilient Moor Lane'.

Having service traffic enter and exit the building from Moorfields, turning within space provided in the building, seems as though it would address all of these concerns.

Residential Amenity: Light and Noise Pollution to Residential Dwellings (Willoughby House)

The Scheme clearly has a large number of windows and a terrace overlooking Willoughby House. The former may cause light pollution at night and the latter noise pollution, unless they are subject to appropriate mitigations.

I suggest that as a condition of the planning:

- all windows facing residential buildings should be fitted with automatic blinds to close at night;¹
- the terraces should also be limited to use on business days only, no later than 6pm, with no exceptions.

It seems that the two mitigations, whilst not at all onerous would substantially reduce the impact from noise and light pollution on Willoughby House.

Other: Negative impact on the setting of the Barbican Conservation Area and Listed Buildings

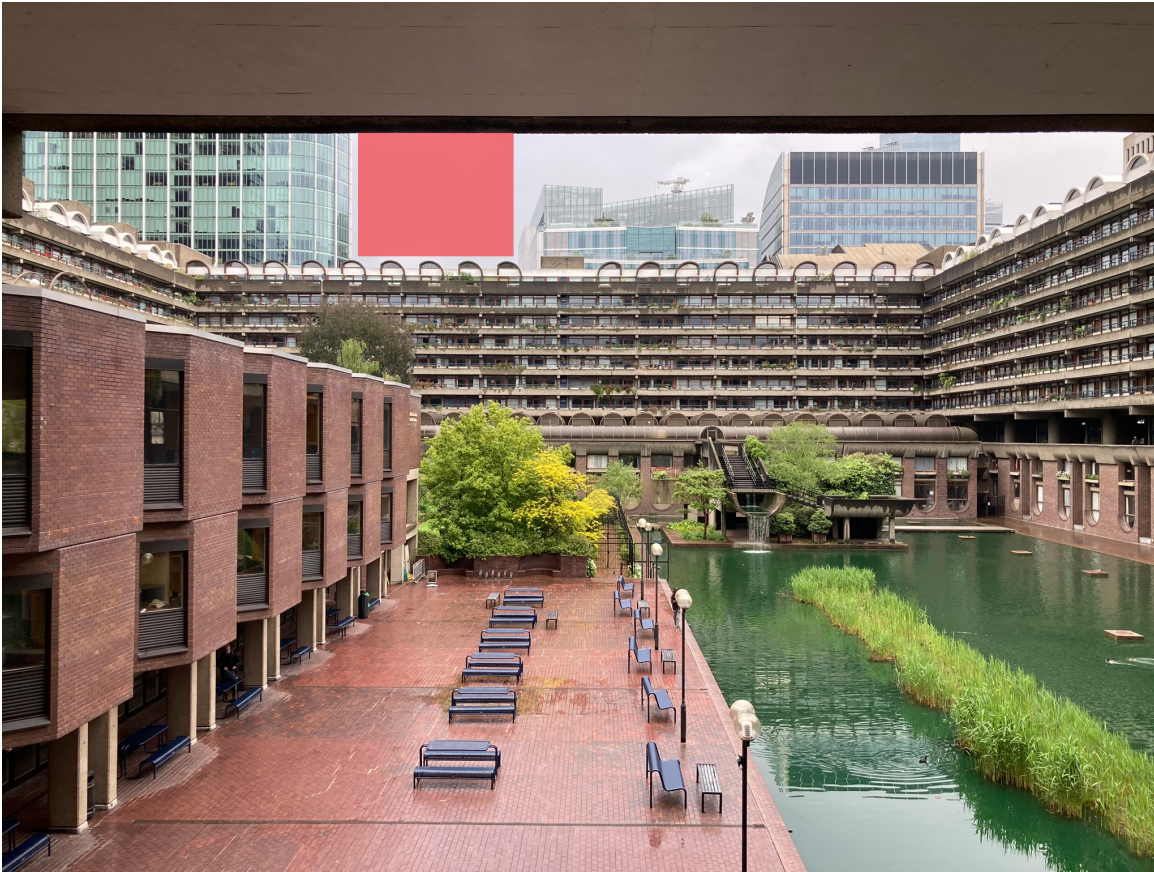
The Barbican Estate Listed Building Management Guidelines² state:

1.5.4 Grandeur. The sheer extent, volume and richness of space, land and water, especially as viewed in both directions from the vantage point of Gilbert Bridge makes it unique in the City of London. Whilst it is differentiated in landscape treatment in numerous ways and thereby is actually experienced as a series of linked 'sub-zones', it is of paramount importance that the overall sense of this space as a single entity is not diminished by any physical intervention or sub-division. Any proposal for alteration would need to be judged against the most stringent criteria imposed by designation.

The photograph below shows the view east from Gilbert Bridge, with the approximate location of the proposed development highlighted in red.

¹ I believe that 1 London Wall Place demonstrates a good positive example of the effectiveness of a blind placed system.

² <https://www.cityoflondon.gov.uk/assets/Services-Environment/spd-barbican-estate-listed-building-management-guidelines-volume-IV.pdf>



The photograph demonstrates that whilst the proposed development lies outside the estate, it would diminish the overall sense of space by dramatically impinging on the remaining visible sky. This is in strict opposition to the very strongly worded guidelines.

Other: Environmental Impact of Scheme

The Planning Statement notes:

5.68 Therefore, the Proposed Development (as amended) is a considerably more sustainable building compared to the 2020 Permission and the proposals submitted in February 2024 in terms of reducing both embodied carbon and operational carbon. A range of sustainability measures have been integrated within the approach to the Proposed Development (as amended), including through the use of high-performing materials which have evolved through detailed design and the provision of additional renewable technologies.

Whilst I welcome measures to aid sustainability, presumably the building could be made even more sustainable by introducing the same measures within a smaller building, in line with the 2020 Permission.

I note that the application also lists other advantages over the 2020 Permission, such as improved public realm, which again could also be achieved with a building of the previously planned height.

The comments on carbon are extremely disingenuous given the applicant chose to completely demolish the existing building rather than refurbish.

Yours faithfully.

Mark McMillan

Ms Amy Williams
City of London PO Box 270
Guildhall
London EC2P 2EJ

1 October 2024

Dear Ms Williams

Re: Tenter House 45 Moorfields London EC2Y 9AE – 24/00209/FULMAJ (the Revised Planning Application)

The Willoughby House Group RTA and the Brandon House Group RTA (the *Group*) together represent 150 flats and 27 houses positioned adjacent to the Tenter House development. Each one of those flats and houses will be adversely affected by the issues raised in this objection since bedrooms and living rooms overlook or are adjacent to the Tenter House developments.

Following consultation with our members, we are making this submission of objection as Chairs of the Group.

Please see below the objections from the Group.

Yours sincerely

Fionnuala Hogan
Chair, Willoughby House Group RTA

Andrew Tong
Chair, Brandon Mews House Group RTA

WILLOUGHBY HOUSE GROUP OBJECTIONS

Members of the Group have raised 9 substantive objections. There are also other objections submitted by some members of the Group individually and directly to the Corporation. We request that you also refer to those in your consideration of the Revised Planning Application.

The **9 substantive objections** concern:

- a. developer's failure to consult stakeholders;
- b. overdevelopment likely to cause damage to residential amenity;
- c. the cumulative loss of light and light spillage by this and each additional development;
- d. terracing;
- e. servicing of the development & the traffic plan;
- f. impact of proposed ground floor restaurant;
- g. community space;
- h. unacceptable impact of carbon emissions; and
- i. honouring commitments made by the Corporation in earlier consultations on developments.

We deal with each in detail below.

A. DEVELOPER'S FAILURE TO CONSULT STAKEHOLDERS

1. The Corporation's Statement of Community Involvement dated July 2024 makes clear that there is a strong expectation that developers and other applicants will

"...enter into meaningful engagement with local communities and key stakeholders in a positive and timely fashion to enable these groups to input into, comment and help shape development proposals before a planning application is formally submitted to the Corporation..."

2. No such consultation took place prior to submission of this Revised Planning Application at the instigation of the developer. Neither the Group nor any particular resident was consulted by the developer before the Revised Planning Application was submitted. Indeed, the Group requested a consultation with the developer once we learned that the developer was proposing to submit the Revised Planning Application.
3. The developer cannot comply with the Corporation's requirement set out in the Statement of Community Involvement that a consultation statement be submitted as a part of the Revised Planning Application. A Statement of Community Involvement was submitted with the original application. The developer has indicated that it does not propose to submit an updated Statement of Community Involvement in connection with the Revised Planning Application. However, it is imperative that the Corporation ensure compliance with its processes by requiring an updated Statement of Community Involvement.
4. We ask that the Corporation require compliance with its own express practices, procedures, requirements and expectations in line with the Statement of Community Involvement.

B. OVERDEVELOPMENT LEADING TO DAMAGE TO RESIDENTIAL AMENITY

5. The proposed design has now increased disproportionately in scale and mass, almost twice the size of the original building permission granted in 2019.
6. The increased height and scale of the proposed development is unacceptable and inappropriate in such close proximity to such a large group of residents. Successive developments have eroded the residential amenities and have, thereby, adversely impacted the health and wellbeing of neighbouring residents. The cumulative impact damages residential amenity by:

- being too close to existing homes;
 - affecting the right to privacy that should be afforded each resident in their home;
 - attendant problems of light pollution at night which impact sleep patterns of residents whose bedrooms are adjacent to that development;
 - increased traffic congestion;
 - increased traffic congestion leads to greater noise and air pollution; and
 - the loss of natural light during the day and the related loss of the last vestiges of visible sky open to many homes in the Barbican.
7. This leads to stress for all affected neighbours and with the proven resultant adverse impact on health. These matters mean that the revised Planning Application conflicts with the Corporation's Local Plan and should not be granted in its terms.
8. In addition, it is to be noted that the increase in height also unacceptably impacts the views of St. Paul's Cathedral from the river. St Paul's Cathedral is not only a building of significant national significance, but also a listed building. The impact on the views of St. Paul's Cathedral is an important issue which conflicts with the National Planning Policy Framework. That Framework considers the setting of a listed building to be itself just as important as the listed building itself. The Corporation should not disregard or overlook the effect of this conflict.

C. LIGHT: CUMULATIVE LOSS OF LIGHT AND LIGHT SPILLAGE

9. Successive developments in close proximity to the Barbican has had an accumulative effect on light into homes opposite the development. It is not appropriate for the developer to disregard the impact of their particular development on top of the effect of existing developments. The analysis should be cumulative and not in isolation with current levels as given.
10. We require that for the impact on light to be properly understood and assessed, the Corporation request that the developer publish the difference in light between the present 11 storey building and the proposed 22 storey development.
11. For the analysis to be in any way meaningful, daylight/sunlight calculations should be independently verified which would then be in line with the Corporation's own policy.
12. To further protect residents from the constant and damaging glare of artificial light during the evening and night, a condition requiring the prevention of light spillage should be included at this planning stage requiring additional measures such as the windows with integrated, automated blinds to the western and southern facing windows of the development.
13. It has been the unhappy experience of this Group that in the case of several developments directly impacting the Group, no action and no responsibility has been taken by any of those involved in the development where it has left to the fit-out stage of the works. It is not being complied with by the tenant or those undertaking the fit-out.

D. TERRACES

14. There are two terraces that overlook the Group's homes. We ask that in accordance with recent planning officer recommendations, the access times and use of the terraces be limited. We must insist that the terraces be required to close by no later than 18:00 hrs and a prohibition on the use of the terraces during weekends or bank holidays and that no exceptions be permitted, by application or otherwise.

E. SERVICING & THE TRAFFIC PLAN

15. Servicing of and deliveries to the development must be undertaken from Moorfields.

16. It should come as no surprise to the Corporation since Kristian Turner's view from the survey shows that the traffic on Moor Lane is already at high levels and the noise impact on residential amenity is significant and, at times, intolerable.
 17. Two key areas of objection from residents are:
 - a. the size and positioning of the service yard; and
 - b. the current traffic plan that provides for access to the site for all traffic from Moor Lane.
- a. Service Yard**
18. The proposal is for vehicles to travel down New Union Street from Moor Lane and reverse out of the service yard.
 19. Previously, none of Tenter House vehicles accessed the site from Moor Lane. In this proposal, the developer:
 - a. has removed the ramp from Moorfields which originally ran down to a car park and delivery area;
 - b. has made the decision to double the height of the building; and
 - c. is planning to use New Union Street from Moor Lane as a throughfare for ALL of the significant number of projected vehicles per day.
 20. These decisions will, undoubtedly, cause increased deliveries, increased servicing traffic and an increase in noise levels.
 21. There is no justifiable reason to impose the inconvenience and stress upon the residents along Moor Lane. Developers and their designers should be required to ensure that their choices, and the resultant design of the development, reduces the impact on residents and other stakeholders instead of increasing it. The designer has suggested that this cannot be achieved due to the narrow opening and the positioning of the core. That is a matter of design and designs can be altered. The change required is neither impossible nor unfeasible.
 22. For example, when the 21 Moorfields building service yard was moved from Fore Street Avenue to Moor Lane it caused a significant increase in traffic along Moor Lane. In an attempt to mitigate the issues this gave rise to, the service yard was increased so that ALL vehicles could turn inside the development and drive out. The Corporation must be aware that even with this change, there has been a very significant and noticeable increase in traffic and noise.
 23. These are matters entirely in the hands of the designer and developer. It has been the choice of the developer, **without** consultation with stakeholders, to increase the height from 11 storeys to 21 storeys as well as to increase the overall size of the development. An obvious consequence is an increase in the deliveries and servicing requirements. It should, therefore, be the developer's responsibility to make the requisite and relevant changes to the internal design, which is entirely practical and possible, rather than ask residents to suffer the consequential negative impact.
 24. Deliveries are expected to start as early as 07:00 hrs. However, such an early start generally means congestion and noise due to those vehicles parking up along Moor Lane, reversing with beepers and street noise.
 25. Bleepers from reversing vehicles onto New Union Street will be a serious noise nuisance to Barbican residents. The sound is high pitched and carries a long distance. Bleepers already cause disturbance from 06.00 hrs. The need for white noise beepers should be made mandatory.
 26. Residents have raised this as a critical issue with the developer and the designers during 2016/17 in the original consultation. The concern of the residents has been entirely ignored. It is also the Corporation's duty to ensure the residents of neighbouring buildings are adequately protected from

harm to health and wellbeing that is caused by increased levels of noise, increased traffic congestion leading to reduced residential amenity.

27. We remind the Corporation that the current Local Plan states that all developments should provide for service bays which are of sufficient size to allow for vehicles to turn around within the bay. We request of the Corporation that the developer be required to comply with the Local Plan policy of the Corporation. It is, therefore, **critical** that the service yard design is amended to be large enough for all vehicles to turn inside the yard. It must, therefore, be the responsibility of the developer and its designers to make these changes in such a highly residential area.
28. The Group suggests minimising the impact can be achieved through:
 - a. a change in the design of the lower level so that the service yard is large enough for all vehicles to turn round within the development without the need to reverse out of the development.
 - b. all traffic being required to enter New Union Street from Moorfields and all exiting traffic to move forwards from New Union Street along the short distance to Moorfields.

b. Traffic plan

29. One of the reasons provided by the developer for the need to allow all vehicles to access via Moor Lane was that the footfall from Moorgate Station was too large to enable access from Moorfields to be a viable option.
30. However, residents provided photos that showed this was not the case. A head count survey carried out as a result of the photo evidence found that Moorfields is only busy between 08:30 hrs and 09:45 hrs on the 3 midweek days. As the Group has been told there will be no deliveries before 10:00 hrs, then footfall cannot continue to be a concern. It is no longer a valid reason preventing safe vehicular access from Moorfields.
31. We have also been told that all deliveries and servicing are strictly regulated to spread out during the day with un-booked deliveries turned away with banksmen on duty. With this process in place, it only goes to strengthen the argument that there is no problem whatsoever for vehicles entering and exiting from Moorfields.
32. Moor Lane is already besieged with deliveries and servicing vehicles and is on the north-south cycleway.
33. The street is included in the Healthy Neighbourhood Scheme that will be part of the matters before the Streets and Walkways Subcommittee on 1 October. Following that, the much-awaited greening scheme for Moor Lane can be started. There are proposals that will widen pavements, create more much needed planting and make Moor Lane a one-way street.
34. Lastly, the solution to noise disturbance that we recommend to the Corporation is for all vehicles to be required to travel in from Moorfields into New Union Street under a strictly regulated system. With good management, of which we have been assured, all vehicles should be able enter and exit the short distance safely from Moorfields.

F. PROPOSED GROUND FLOOR RESTAURANT

35. Certain measures were put in place in relation to the operation of Barbie Green which is also very close to residential homes. In that case, there are strict requirements in place in relation to opening hours and a prohibition on the off-licence sale of alcohol.

36. The placement of the restaurant at the Tenter House development away from the original site (facing City Plaza) to the corner of Moorfields will have a direct impact on the ability of vehicles accessing the development from the Moorfields side, as proposed above.

37. We ask that consideration be given to these two issues to ensure that residents are not impacted negatively.

G. COMMUNITY SPACE

38. The community space will fail as a useful addition unless it is adequately funded and with the appropriate frameworks in place for how it will be managed and controlled. For this aspect to continue as proposed then we request that funding be secured for a period of at least 10 years.

H. CARBON IMPACT IS UNACCEPTABLE

39. The release of embodied carbon should be appropriately accounted for.

40. Any scheme in the current development environment and overall environmental context needs to meet both its commercial objectives AND its carbon reduction goals.

I. HONOURING COMMITMENTS MADE IN EARLIER CONSULTATIONS

41. All the evidence and experience from similar developments on other sites around the Barbican is that, even with a better risk profile, unfavourable changes are made after consultation.

42. We have had direct experience of this in relation to the 21 Moorfields building where, for example, the site was increased in size since consultation, the security demise has been moved outside the planning footprint with direct and negative consequences for residents and local amenity and environment and the delivery entrance has moved so that, instead of being tucked away, it is now directly opposite Barbican bedrooms.

43. It is important that the Corporation is clear about which of the commitments made during consultation will be honoured. These commitments need to be documented so that it can be adhered to, even if the design evolves.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Ms Lila Rawlings

Address: 719 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:- Once again - we have another new building that - rather than being repurposed - will release a huge amount of CO2 into the surrounding area - this is in direct opposition to the CoL's alleged commitment to greening the Square Mile. We have lived with so much development, noise, building work at all hours, endless cranes, deliveries and continue (with what is quite honestly) a battle to live our lives, raise our children in a calm and peaceful environment.

- The increased height of the building by from 11 to 21 floors is unacceptable and impacts not only our right to light and a view of the sky, but also the view of St Paul's from the river. Plus this additional 10 floors will caused increased disruption, endless traffic jams (currently there are many instances where residents and delivery vans cannot get into our car parks).

- The traffic plan is also an issue - with the development of Deutsche Bank, Moor Lane has become a total road-block making Vans and lorries are parked there all day and arrive in the early

hours - before 6am - with endless beeping and drivers shouting and waking up the entire block. The road is at capacity and cannot take any more traffic. All servicing and deliveries will need to be made from Moorfields - plus the service area needs to be accessed from this direction to avoid 200 people up in arms and creating more headaches for the landlords and tenants of the building.

- We speak from experience - when the Deutsche Bank service area was relocated to Moore Lane, the vehicle turning area was increased but lead to a massive increase in noise and disturbance. This should be a lesson learned and be taken in consideration by the developers.
- The solution to noise disturbance is that all traffic travels in from Moorfields into New Union St. We have undertaken our own survey of commuter footfall which confirms Moorfields is only busy between 8.30-9.45am Tues-Thurs which means access can be regulated and managed.

From: [REDACTED]
To: [REDACTED]
Subject: Objection to Tenter House Planning Application Ref: 24/00029/FULMAJ
Date: 02 October 2024 16:41:03

You don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

Subject: Objection to Tenter House Planning Application Ref: 24/00029/FULMAJ

Dear Sir/Madam,

I am writing to formally object to the planning application Ref: 24/00029/FULMAJ for the proposed development of Tenter House. I, along with many other residents of Willoughby House, have serious concerns about the impact this proposal will have on our community, the surrounding environment, and the cityscape of the area.

1. Excessive Height and Scale

The increase in height to 21 storeys, along with an additional tower, represents a significant and unacceptable escalation in the scale of the development. This will dramatically alter the skyline, block views of important landmarks such as St. Paul's Cathedral and the river and create a claustrophobic environment for the residents of Willoughby House. The height is disproportionate to the surrounding buildings, undermining the architectural character of the area.

2. Loss of Privacy and Overlooking

The proposed balconies running along the length of the southern façade, particularly those on the top floors, will create a direct line of sight into the bedrooms and living spaces of Willoughby House residents. This is an unacceptable invasion of privacy. Although the developer mentions some greenery to offset this issue, it is unlikely to provide sufficient coverage or mitigate the impact.

3. Terraces and Noise Pollution

The terraces proposed in the revised plans are likely to be a significant source of noise pollution. While closing them at 6 pm is a condition, this does not prevent disturbances during the day, especially on weekends and bank holidays. The plan does not provide a robust solution to mitigate noise in what is already a densely populated area, and these terraces should not be permitted.

4. Traffic and Servicing Issues

Moor Lane is already a high-traffic area, with the added danger of narrow lanes and frequent congestion. Allowing additional servicing and deliveries from anywhere other than Moorfields will exacerbate the existing traffic problem and increase safety risks for pedestrians and residents. Noise from increased delivery vehicles and the strain on the road infrastructure must be carefully considered.

5. Inadequate Loading Bay and Traffic Flow

The loading bay proposed must be designed to fully accommodate vehicles turning around without blocking traffic flow or causing additional hazards. A poorly designed bay will lead to further congestion and noise pollution, significantly affecting residents and visitors.

6. Automated Blinds for Light Pollution

As a measure to protect residents from intrusive light pollution, it is critical that the development incorporates automated blinds, particularly on the west and south-facing windows. Willoughby House residents already suffer from significant light pollution in their bedrooms due to the neighbouring City Point and Deutsche Bank developments, where occupiers have made little to no effort to mitigate the impact on their residential neighbours. Without proper controls, the addition of Tenter House will only worsen this issue, further disrupting the quality of life for residents. Automated blinds or similar measures are essential to minimize light pollution and preserve the liveability of the area.

7. Inadequate Community Benefits

The proposal includes a “community venue” on the ground floor. However, no clear explanation has been provided as to how this space will be managed or controlled. There needs to be a firm commitment to ensure that this space will be of real benefit to residents, rather than just a commercial enterprise with limited public access.

8. Sunlight and Daylight Impact

The daylight/sunlight calculations provided by the developer should be independently verified, as the increased height and massing of the building are likely to block sunlight and cast large shadows over neighbouring properties. The loss of natural light will have a detrimental impact on the well-being of local residents, as well as potential effects on the surrounding public spaces.

9. Environmental and Carbon Considerations

The environmental impact of the development, particularly concerning the embodied carbon within the construction process, has not been fully addressed. The City of London must take strong measures to ensure that any new development is not only sustainable but actively contributes to reducing carbon emissions. The current proposal lacks sufficient detail in this area.

10. Heritage and Cultural Impact

The development could also detract from the cultural and historical significance of the surrounding area. The iconic views of St. Paul’s and other nearby heritage landmarks will be compromised, which undermines the character of the City of London. Any new development should respect the unique historical context of its surroundings, something this proposal fails to do.

11. Community Consultation

Finally, it is concerning that the developer’s revised plans do not appear to adequately reflect the concerns raised by the Willoughby House residents in previous

consultations. True community engagement requires meaningful changes in response to feedback, which seems to be lacking in this case.

In conclusion, while we understand the need for development, this particular proposal is overbearing, intrusive, and harmful to the local community. I strongly urge the planning committee to reject this application or, at the very least, require substantial modifications that address the numerous issues raised.

Thank you for considering my objections.

Yours sincerely,

Bruce Robertson
511 Willoughby House

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Lisa Shaw

Address: Flat 103 Cromwell Tower, Barbi London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I am supportive of the demolition and redevelopment of the current 11-storey building on this site.

However, I strongly object to the proposal to replace it with the proposed 21-storey building.

Failure to consult

Firstly, I am a local resident who will be impacted by the development. Despite this, there has been a total failure of the developers to notify or consult with us regarding this new proposal. I have heard about it through other means for the first time today.

Height

The revised proposals add considerably more bulk and height than was initially contemplated, taking no consideration of the concerns already expressed. This increase impacts not only local residents, but the views of St Paul's from the river.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

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Case Officer: Amy Williams

Customer Details

Name: Mr Alan Budgen

Address: 301 Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am a resident and Chairman of Cromwell Tower House Group a recognised RTA. I am objecting to this application for several reasons.

- 1) There has been no public consultation. Any dialogue that might have occurred with residents, has not included Cromwell residents. I was invited to one meeting with the developer, where they discussed the process of demolition. They have not presented the revised (or previous) plans to us.
- 2) In recent years the eastern end of the Barbican Estate has been boxed in with ever taller, bulkier buildings. The Tenter development will be even more damaging and overbearing due to its even greater height. It will impact on the homes in Willoughby House, Brandon Mews, Speed House, The Heron, Gilbert House, Andrewes House and Cromwell Tower.
- 3) The height of the building impacts protected views of St Paul's Cathedral.
- 4) The proposal includes terraces which would overlook the homes in Willoughby House, and have a negative impact on the privacy and enjoyment of homes.
- 5) A taller building will require more servicing, this should not be in Moor Lane outside of a

residential block. This road is already busy and noisy and has required traffic calming measures. All deliveries, and loading needs to take place on the Moorgate side of the building.

6) As there has been no dialogue with the developer we do not know how another tall building will impact sunlight and wind on the locality.

7) From a sustainability point of view, we do not know why the existing building could not be retained and retrofitted, instead of the very damaging release of embodied carbon that will result from the new building. This is not sustainable and goes against the City's own Retrofit First policy.

8) The revisions to this application result in a "tall building" which the Mayor of London (and therefore City of London emerging planning policy) says is unsuitable for this location.

Therefore I urge you to reject this application.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Guillaume Faucompre

Address: 327 Willoughby House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I had previously commented on the proposal, the updated proposal doesn't change in any way my concerns so I will put this comment back here:

"I participated to the public exhibition in November 2023 where I raised my concerns in writing about the height of the proposal (at the time 7 stories more than the existing building).

I received recently a thank you note from Freshwater in which they stated: "The feedback given by you, and many other local residents and businesses, has helped shape the final details of the plans"

I asked specifically what those details were and received a STATEMENT OF COMMUNITY INVOLVEMENT document in which my concerns about height (as well as noise and sustainability issues) are noted as shared by other people.

But I also realised to my astonishment in this document that the total height of the proposal has been increased by another 4 stories (22 total, now updated to 21).

What is the point of public feedback if they are here to be taken, ripped up and completely ignored. It almost feels like those 4 stories have been added only to spite the people who have raised concern.

The only window of clear sky available from my bedrooms were in between Citypoint and 21Moorfields. And this proposal is getting rid of this altogether to render the view completely artificial.

Moreover, any proposal that pretends to be more sustainable when it actually involves the destruction of existing buildings instead of refitting is just pure greenwashing.

So I can only object to this proposal that again ignores affected residents concerns.

Some people on the planning committee might see this comment as nimbyism, I prefer to see it as niabyism (not in anyone's backyard)."

Regarding what Moor Lane is becoming: it is designated as a Health Neighbourhood Scheme, and was due for a "greening" phase a few years back. But with the added bulky buildings it is rather a service lane dedicated to trucks and lorries. So everything but healthy

From:
To:
Subject: Tenter House Planning Application Objection - 24/00209/FULMAJ
Date: 02 October 2024 19:02:57

THIS IS AN EXTERNAL EMAIL

Hello,

I'm writing to object to the Tenter house Proposed Changes in height.

I think it is unfair and it is clearly not what was originally agreed upon. I look directly out of my window and see the building site through the City Point in front of my window.

Firstly, the new levels will **block out what is left of the light** that reaches my bedroom and the additional noise & work for the extra levels I do not want to be hearing nor breathing in the extra dust associated with all of this construction.

People need to have a chance to have their flats independently verified further and have the loss of light calculated prior to any building works and we haven't been able to regarding the proposed change in height!

Secondly, increasing the height also increases deliveries and services to the building which consequently on a road (moor lane/ New union Street) so small and narrow will cause **unnecessary noise** from the bleeping and reversing all of the vehicles will have to do.

As I work from home and my room is facing Moor lane it's severely disruptive to my work/income, focus, sleep and health!

Time should be limited on the proposed balconies to regular working hours in the opposite offices as the noise can be disruptive. That can easily be fixed to set hours and no bank holidays.

Proposed SOLUTION TO NOISE:

- 1) Vehicles travel solely in from Moorfields into New Union Street with a fiercely monitored system, no exceptions coming through Moor lane as it is already too narrow and is residential!
- 2) Limit terrace times: Limited to/between hours of 9am- 6pm and no later!
- 3) Independent light loss verification

From,
Poppi Haynes

705 Willoughby House, Barbican, EC2Y 8BN

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Mr David Hall

Address: 509 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: My objections based on the experience of living more than 20 years overlooking Moor Lane are:

- The proposed height is far too tall and will seriously affect the neighbours and the views of St Paul's from the river. This iconic view needs to be preserved, and a lower height would help prevent the overshadowing of nearby buildings.
- Terraces should be closed by 6 p.m. at the latest, no exceptions. Leaving them open any later would cause noise and disturbance to residents' bedrooms.
- Delivery noise should be avoided by servicing from Moorfields. Our daughter has been woken

from the noise of deliveries being made on Moor Lane. Vehicles should not be reversing into Moor Lane with the associated noise.

- Light Pollution is an obvious problem on Moor Lane. Any permission granted should include a condition that all west-and south-facing windows have blinds.

- The daylight and sunlight calculations need to be independently checked. This will ensure they're accurate and fair, especially considering the potential impact on nearby homes and buildings.

As a resident of the City, I'm keen to ensure that it continues to be a vibrant place. Still, where the development is so close to residents' bedrooms, developments need to align with the needs of residential amenity. This application does not reflect that the developer has taken it seriously without changes.

From:
To:
Subject: Tenter House Planning Application Objection - 14/00209/FULMAJ
Date: 02 October 2024 19:25:56

THIS IS AN EXTERNAL EMAIL

Tenter House Planning Application Objection
14/00209/FULMAJ

- I understand that a revised plan has been submitted for planning which will greatly increase the size of build of the old plan.
- This area of London is already incredibly dense so it's bewildering why there are new plans to make it more so.
- The impact on the East side of the Barbican Estate is already substantial and this just further adds to it in a very unwelcome way.
- Don't the planning committee see the trend of people working from home and that there is less need for office space?
- The areas doesn't need 'an enlarged retail unit,' and certainly not another Pret. What residents would like are real retail units affordable not just to global chains.
- On every level this filling-in of that dreadful architectural pile-up of buildings that run along poor old Moorfields is super-sized and over-bearing. Try and walk from Moorgate Station to the Barbican Centre and the effect is overwhelming and oppressive by these top-heavy buildings.

- On a broader note I find it reprehensible to watch buildings come down which are younger than me — I'm 68 — don't we all understand that we can't go on continuously building and tearing-down and building as if none of this has any impact on our collective lives/planet!/?

Please don't allow another monster here.

Thank you

Lucy

Lucy Sisman

293 Cromwell Tower | Barbican
London | EC2Y 8DD

From:
To:
Subject: Tenter House Planning Application Objection 14/00209/FULMAJ
Date: 02 October 2024 21:39:50

THIS IS AN EXTERNAL EMAIL

Dear CoL planning officers,

I have only just been made aware that there is a change to the planning application for Tenter House, and that the deadline for objections is tonight!.

As my flat in the Barbican (Cromwell Tower) looks onto Tenter House, I was surprised that I had missed whatever statutory notification had been sent round. Ironically, it was my comments about the noise of demolition that had initiated the conversation about the revised construction proposal.

I would like to object to the new design, both on account of its impact on the skyline, and on the neighbourhood more generally. This area around City Point is already hugely overdeveloped, and given persistent low occupancy rates, has become a desert. It is hard to understand how developers, or the CoL itself, expect to generate a profit, let alone excitement and an enhanced reputation for the city as a place to work and live by building yet another generic, unwanted and unmemorable structure, even were it to have token 'public spaces' and sad attempts at greenwashing.

Surely at some point the City has to decide what it wants to be beyond an area where relatively recently built offices are torn down and replaced in an ever quickening cycle of carbon emitting projects. The Barbican, for all its Marmite qualities, at least offers a coherent vision. Modern technology should make it far easier to do so now than it was in the late 1960s. By allowing piecemeal development by a variety of uninspired architects of contiguous parts of this neighbourhood that, if consolidated, could offer an opportunity to have a real and positive impact, with more efficient use of space and better design, the City is missing an opportunity to advance its overall vision for the square mile.

The constant noise of demolition and construction, with all the attendant movements of large vehicles and the hideous increases in carbon emissions are already having a seriously deleterious effect on residents and workers alike.

Unless there are overwhelming arguments in favour of this increase in the size of the proposed building, I would urge the planning committee to turn down the application. Otherwise we will just face another, even bigger, demolition and construction project in a few years time as the cycle goes round again.

RMD Barrett CMG OBE
293 Cromwell Tower
EC2Y 8DD

From:
To:
Subject: RE: Tenter House
Date: 03 October 2024 11:49:16

THIS IS AN EXTERNAL EMAIL

I am a resident of Cromwell Tower and extremely concerned about the proposed development at Tenter House and the additional floors now planned with almost no warning and giving almost no time to object or allow for discussion etc to those most severely affected by this proposal. The new plans will make the building almost double in height to what was originally planned, which is quite alarming.

Please, please re-consider this project and take the serious concerns of those residents living directly and near this proposed building and all that it will add to the already overloaded road use, car-parking and access facilities, not to mention the substantial increase in noise and loss of privacy in many cases.

The Barbican is a unique residential building complex and should be given the respect it deserves, not only to the residents living there, but also to the architects' vision of how it stood within the city. The space around it, the views to St Paul's and the river and more will all be severely affected and curtailed by the plans for Tenter House.

I ask you again to please re-consider the plans for this building.

Kind regards

Felicity Guinness

333 Cromwell Tower | Barbican | London EC2Y 8NB

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Mr Colin Davis

Address: 5 Moor Lane City of London London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: My primary concerns are the height of the building which will considerably reduce the sunlight at the City Point plaza - a very well used public open space.

Secondly the arrangements at the service bay are not sufficient to allow large vehicles to enter and leave in a forward direction. When large vehicles reverse, their audible warnings can be heard some distance away. This causes an unnecessary disturbance to residents of the Heron, 5 Moor Lane

Ms Amy Williams
City of London PO Box 270 Guildhall
London EC2P 2EJ

Issued via email:


plncomments@cityoflondon.gov.uk

3rd October 2024

Dear Ms Williams,

Objection to SCHEME AMENDMENTS to planning application 24/00209/FULMAJ for the demolition and building at Tenter House, 45 Moorfields, London, EC2Y 9AE

I would like to register my objection to this development on the grounds of its additional height and massing, this being additional to the original planning. In addition, the complete lack of consideration to provide a sustainable development, together with the lack of consideration to the local community and the damage to amenity for its residential neighbours. As our landlord, it had been assumed that you should have the interests of your leaseholders front and centre but permitting yet another development which damages our amenity would suggest this not to be the case.

The changes to the planning application have now resulted in a tall building which is understood was not intended to be within this location, but within designated clusters and that this area is not within one of those clusters. The height also appears to contravene the “permitted view” related to St Pauls, which was so carefully considered with 21 Moorfields (Deutsche Bank building).

The potential noise pollution from the proposed roof terraces will exacerbate the noise from the existing bar, the Refinery, the patrons of which spill onto the street on Moor Lane and clearly have no regard to the residents of the Barbican. I am unsure of the restrictions that are placed upon this publicly licenced establishment, but it is clearly poorly controlled. The concern regarding the roof terraces is that they are likely to be private and will receive little or no control. From a residents’

perspective, these need to be closely managed and a closure time, preferably early evening, imposed to ensure no disruption to the residents' peaceful enjoyment of their own properties.

The City of London should reflect upon their principle of retrofit, of which they make grand policy statements, yet fail to follow the standards which they set, particularly if they permit this development to continue in accordance with the application referenced in the subject matter.

Yours sincerely

A large black rectangular redaction box covering the signature area.

Michael Rowley

Florin Court
6-9 Charterhouse Square
London EC1M 6EU



Ms. Amy Williams
City of London
PO Box 270
Guildhall
London EC2P 2EJ

3 October, 2024

Dear Ms. Williams,

This is just to let you know that that the latest plans (“Amendments”) for the demolition and re-building of Tenter House, 45 Moorfields, London, EC2Y 9AE are, well, unfit for purpose. (In other words, they suck.)

I don’t live that close to the site – as you’ll see from my address, above – but I’ve lived and worked in this area since 2006, and know it well. For years I’ve walked to work through that area, and had after-work drinks with colleague at the now-permanently-closed Rack & Tenter pub.

So I’m sending you my objection to these “Amendments” (evidently meant to provide more income to the already-well-remunerated developers) on the grounds of their un-sustainability; un-necessary (and horrific) mass and height in an already-increasingly-awful and sunlight-deprived area; and generally awful urban planning.

These revisions to the already-dire (in my opinion) proposal for development of this site result in an unsuitably-massive building

for this particular site, at a time when there are increasing calls for more well-thought-out and less massive-for-the-sake-of-it developments.

(As you will be aware, , consultations on these revisions were never held, or so I understand; what's more, the Mayor of London has, I'm told, already weighed in on this subject.)

As you will also be aware, The proposed revisions would affect sightlines of St Paul's Cathedral, which are supposed to be protected, but increasingly, are being ignored.

Apart from all that, though, is the fact that this is looking like yet another example of a greedy developer trying to add additional mass to its otherwise un-remarkable project, for no reason other than to make yet more money by the addition of more floors; and being generously accommodated by the relevant lawmakers.

Moor Lane is, of course, hardly an outstanding example of urban design, even now, although it could be, given that it links an increasingly important train/tube station with the (thus-far unremarkably landscaped) open spaces that were created when the various nearby towers were erected.

But drilling down into the proposal, I find that the proposed development's Whole Life Carbon Assessment (WLCA) actually fails to include the carbon associated with the demolition of the existing building. (Pretending that there would be no carbon impact because the demolition would be taking place under the planning consent for a different project is a bit of a farce, and makes a mockery of the City's "retrofit first" claims.

The proposal, as I understand it now, also fails to address the issue of the loss of sunlight that the proposed scheme's added height and bulk will result in, for those living and working in the area (a too common but no less important fact of modern development in the City of London).

As it stands now, the scheme is already three storeys higher than the 2020 consent, and it still breaches Mayoral policy and emerging City of London policy.

In conclusion: Not only should a fully independent assessment be done, ASAP, but it should also be shared with adjacent property owners, as well as local media organisations and all of the major London mainstream media outposts.

Sincerely,

Helen B. Roberts

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].
Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Case Officer: Amy Williams

Customer Details

Name: Mrs Elizabeth Hiester

Address: 413 Gilbert House, Barbican, London EC2Y 8BD

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Increased size, additional stories and balconies will result in further intrusion to amenity of my 4th floor east facing Gilbert House flat.; particularly light and privacy. Moor Lane is an essential access point to the eastern part of the Barbican Estate which already has an excessive amount of traffic and noise. The construction work and then ongoing servicing of, and deliveries to, the development will cause dangerous additional traffic flows.

Comments for Planning Application 24/00209/FULMAJ

Application Summary

Application Number: 24/00209/FULMAJ

Address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

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Case Officer: Amy Williams

Customer Details

Name: Mr Benjamin Lesch

Address: Flat 334 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I am a resident in Willoughby House and I object to this application for the following reasons:

- The additional height of the proposed building would significantly reduce the amount of sunlight in my home.
- The proposed balconies/roof terraces would likely produce significant noise levels unacceptable for a residential area. Use of the terraces must be restricted to weekdays only, and must stop before 6pm. Such restrictions would also be needed to address the significant privacy concerns raised by these balconies facing residential bedrooms.
- A service access from Moor Lane is unacceptable, due to the considerable noise caused by manoeuvring and reversing lorries. Apart from engine noises, lorries are equipped with

loudspeakers that either beep loudly or announce where the vehicle is going. This creates noise levels that are comparable to those of building works. This has a particularly detrimental impact on residents as there are well over a hundred bedrooms facing Moor Lane. Any movement of delivery vehicles therefore should be confined to times that would also be acceptable for building works, i.e. 8am-6pm on weekdays and 9am-2pm on Saturdays. Vehicles over 3.5 tonnes should be banned from Moor Lane altogether outside of those hours.

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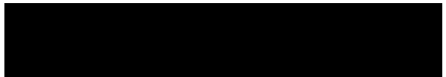


Historic England

Ms Amy Williams
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00209/FULMAJ
Our Ref: 220630

Contact: Helen Hawkins



12th April 2024

Dear Ms Williams,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023

Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development)

Recommend Amendment of Archaeological Desk Based Assessment

Thank you for your consultation received on 09th April 2024.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice in accordance with the National Planning Policy Framework and GLAAS Charter.

An archaeological desk-based assessment has been submitted with the planning application (Waterman 2024). The desk-based assessment does not meet CIFA or GLAAS standards and should be revised in order to meet these standards. Historic maps pre-dating 1893 are discussed but not illustrated-illustrations of early maps should be included as standard and an extract from the Roman map of London produced by MOLA should also be included within City DBAs. There is no discussion of the expected depths of impact from the current or any previous buildings on the site-details of the depth and extent of the current basement should be provided. The discussion of expected impact from the new development is also weak. No plans or sections of the new development have been included and there has been no attempt to illustrate where new impact is likely to be located outside areas of current impact. Despite being requested by GLAAS when contacted to confirm a search radius for the site, no consideration of impacts from any proposed public realm, landscaping and drainage/service works has been provided.

Until the information outlined above has been provided in the DBA, I cannot make an informed decision on likely requirements for archaeological conditions for the site.

Further information on archaeology and planning in Greater London is available on the Historic England website

This response relates solely to archaeological issues.

Yours sincerely

Helen Hawkins

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Your ref:
My ref: 24/02336/OBS

Please reply to: Nikki Mitchell
Tel No: 07866037846
Email: southplanningteam@westminster.gov.uk

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

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

23 April 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 24/02336/OBS **Application Date:**
Date Received: 09.04.2024 **Date Amended:** 09.04.2024

Plan Nos: Email from City of London dated 9 April 2024

Address: Tenter House, 45 Moorfields, City Of London, London

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Yours faithfully


Deirdra Armsby
Director of Town Planning & Building Control

Note:

- 3f The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.





Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Environment Department

Telephone

Email

Date 18 April 2024

Our Ref DS/FS24/0021

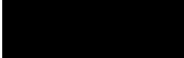
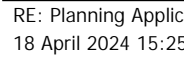
Your Ref PT_AW/24/00209/FULMAJ

Subject Tenter House 45 Moorfields London EC2Y 9AE

In response to your request for comments in relation to the application the District Surveyors Office has the following comments to make:

The District Surveyors Office has reviewed the fire statement and has no comments.

The proposal is considered to comply with policies D5 and D12.

From: 
To: 
Subject: RE: Planning Application Consultation: 24/00209/FULMAJ
Date: 18 April 2024 15:25:28
Attachments: [image001.png](#)
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good afternoon,

Application No: 24/00209/FULMAJ

Site address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Thank you for your consultation.

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 railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of LUL engineers that:

- our right of support is not compromised;
- the development will not have any detrimental effect on our structures either in the short or long term;
- the design must be such that the loading imposed on our structures is not increased or removed;
- we offer no right of support to the development or land.

Therefore, we request that the grant of planning permission be subject to conditions to secure the following:

a) No preparatory works (including removal of roof top plant enclosures; roof top plant rooms; rear conservatory; signage; main reception (including glass cladding); stone cladding panels; rear extension to loading bay; and removal of the railings to the terrace) shall take place until a detailed design and method statement (in consultation with London Underground) for such works has been submitted to and approved in writing by the local planning authority which:

- provides details on all existing structures;
- provides details on the use of tall plant / scaffolding;
- accommodates the location of the existing London Underground

- structures;
- demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
 - demonstrate that there will at no time be any potential security risk to our railway, property or structures;
 - accommodates ground movement arising from the demolition thereof.
- b) No demolition (other than preparatory works covered by part (a) of this condition) shall take place until a detailed design and method statement (in consultation with London Underground) for demolition has been submitted to and approved in writing by the local planning authority which:
- provides details on all existing structures;
 - provides details on the use of tall plant /scaffolding;
 - accommodates the location of the existing London Underground structures;
 - demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
 - demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
 - accommodates ground movement arising from the demolition thereof.
- c) No works (other than demolition) shall be commenced until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:
- provides details on all proposed structures;
 - provides details on the use of tall plant/scaffolding;
 - accommodates the location of the existing London Underground structures;
 - demonstrates access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
 - demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
 - accommodate ground movement arising from the construction thereof;
 - and
 - mitigate the effects of noise and vibration arising from the adjoining operations within the structures.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground

transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Tom Li

Safeguarding Engineer (LU+DLR) | Infrastructure Protection

5 Endeavour Square | 7th Floor Zone B | Westfield Avenue | E20 1JN



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

From: [REDACTED]

Sent: 09 April 2024 09:34

To: Location Enquiries [REDACTED]

Subject: Planning Application Consultation: 24/00209/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for Tenter House 45 Moorfields London EC2Y 9AE .

Reply with your comments to [REDACTED]

Kind Regards

Planning Administration

On behalf of

Amy Williams

Environment Department

City of London

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City of London Corporation PO Box 270 London EC2P 2EJ
<https://portal.cityoflondon.gov.uk/>
tel: 020 755 3275 fax: 020 755 3276 www.cityoflondon.gov.uk
PLNConsensus@cityoflondon.gov.uk N7CN7a2v7zL6W410H971106440755646v7CN6t694bLd465683V0122210b6bN7C0N7C0N7C0B4913642692722N7CU4ksswN7CTWj6GZab4aj7W9p4dC7e1JAAMDALCQp6v7z6M6E6JBT0013tWwLc7KVCYCBMA6v7D5v7C0N7C0N7C0N7C0Adata:q6v728497QdFy0aa6RdH8H8c7006b1ZJdaA5v7Fv7F0v7Ddsswv6d7

-----Original Message-----
From: Yama, Yusef [redacted]
Sent: Thursday, April 15, 2021 3:50:29 PM
To: Williams, Amy [redacted]
Cc: Tames, Lee [redacted]
Subject: 240229-FULMAJ - Tanner House 45 Moorfields

Hi Amy,
The proposed waste and storage collection facilities indicated on Drawing No. and P1199 Rev A and TR010 Rev A, comply with our requirements and are adequate for the proposal. Therefore, this division will not raise any objection to this application.

Thanks
Yusef
-----Original Message-----
From: [redacted]
Sent: Thursday, April 8, 2021 9:11 AM
To: Yama, Yusef [redacted]; Tames, Lee [redacted]
Subject: Planning Application Consultation - 24 02029-FULMAJ

Dear Sir/Madam,
Please see attached consultation for Tanner House 45 Moorfields London EC2Y 0AE.
Reply with your comments to: RFFY@LDC <mailto:RFFY@LDC> <mailto:RFFY@LDC> <mailto:RFFY@LDC>
PLNConsensus@cityoflondon.gov.uk

Kind Regards
Planning Administration
On behalf of
Amy Williams
Environmental Department
City of London



PLNComments@cityoflondon.gov.uk

19 April 2024
Crossrail Ref: CRL-IP-3150

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

Dear Amy Williams,

24/00209/FULMAJ : Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 09 April 2024, requesting the views of TfL on the above application. I confirm that this application relates to land within the limits of land subject to consultation by the Crossrail Safeguarding Direction. If the Council, in its capacity as Local Planning Authority, is minded to grant planning permission, please apply the following conditions on the Notice of Permission:

Elizabeth line condition for foundation design and settlement

- C1 None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling, any temporary works, and site investigations, have been submitted to and approved in writing by the Local Planning Authority which:-
- (i) Accommodate the Elizabeth line infrastructure, including any temporary works associated with the Elizabeth line (formerly known as Crossrail),
 - (ii) Mitigate the effects on the Elizabeth line, of ground movement arising from the development. The development shall be carried out in all respects in accordance with the approved design and method statements.

All structures and works comprised within the development hereby permitted which are required by paragraphs C1(i) and C1 (ii) of this condition shall be completed, in their entirety, before any part of the building[s] hereby permitted is/are occupied.

Elizabeth line Informative - transmitted groundbourne noise & vibration

- I1 The Developer is recommended to assess and mitigate the possible effects of noise and vibration arising from the operation of the Elizabeth line.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

.....
Please send, by email, all planning application consultations that are captured by the SoS Crossrail
Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk
.....

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

From: [REDACTED]
To: [REDACTED]
Subject: RE: [EXTERNAL] Planning Application Consultation: 24/00209/FULMAJ [SG37222]
Date: 19 April 2024 16:01:13
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37222

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

2TAM

NATS Safeguarding

[REDACTED]
4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Public

From: [REDACTED]
Sent: Tuesday, April 9, 2024 9:36 AM
To: NATS Safeguarding <[REDACTED]>
Subject: [EXTERNAL] Planning Application Consultation: 24/00209/FULMAJ

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Dear Sir/Madam

Please see attached consultation for Tenter House 45 Moorfields London EC2Y 9AE .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

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Ms Amy Williams
City of London Corporation
Guildhall, PO Box 270
London
EC2P 2EJ

Direct Dial: 020 7973 3765

Our ref: P01575410

22 April 2024

Dear Ms Williams

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

**TENTER HOUSE 45 MOORFIELDS LONDON EC2Y 9AE
Application No. 24/00209/FULMAJ**

Thank you for your letter of 9 April 2024 regarding the above application for planning permission.

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

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

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

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

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

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

Yours sincerely



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

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





Historic England

Breda Daly
Inspector of Historic Buildings and Areas
E-mail: [REDACTED]



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

Telephone 020 7973 3700
HistoricEngland.org.uk



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

MEMORANDUM

To Amy Williams

From City Gardens
My reference
Your reference 24/00209/FULMAJ
Being dealt with by Alex Roebuck
Telephone 07743 168769
Date 22 April 2024

**Tenter House 45 Moorfields London EC2Y 9AE
Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].**

New trees are proposed at ground floor level and elsewhere on the site. Whilst new trees and greening are welcomed, the proposals include trees in planters at the ground floor at very large initial sizes. These are not likely to establish well or provide sustainable canopy cover when planted at this size in these conditions.

Trees at a maximum size of 20-25 would be more suitable for such planting locations. I suggest that details across the site of tree species, sizes, soil volumes, planting and maintenance details should be secured by condition.

regards,

Alex Roebuck
Arboricultural projects officer

Your Ref:
Our Ref: 24/01123/OBS

Lambeth

Amy Williams
PO Box 270
Guildhall
London
EC2P 2EJ

30th April 2024

RE: REQUEST FOR OBSERVATIONS

Dear Amy Williams

DECISION NOTICE
TOWN AND COUNTRY PLANNING ACT 1990.

REQUEST FOR OBSERVATIONS

I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and RAISES NO OBJECTION

Application Number: 24/01123/OBS Date of Application: 09.04.2024 Date of Decision 30.04.2024

Proposed Development At:

Adjoining Borough Observations Within The Corporation Of London

For: Observations on a proposed development within the adjoining Borough of City of London with respect to Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AO()] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GIA] at Tenter House 45 Moorfields London EC2Y 9AE

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Approved Plans

Lambeth Planning
PO Box 80771
London
SW29 0Q

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

Conditions

Notes to Applicant:

Yours sincerely



Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 30th April 2024

Ms Amy Williams
Planning Department
City of London PO Box 270
Guildhall
London EC2P 2EJ

5th May, 2024

Dear Ms Williams,

Objection from the Barbican & Golden Lane Neighbourhood Forum

Reference 24/00209/FULMAJ

Address Tenter House, 45 Moorfields, London, EC2Y 9AE

Proposal Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Summary SITE AREA: 0.3774 ha - STOREYS: 22 - HOMES: 0 - FLOOR AREA: 31933 m²

This site has been subject to multiple planning applications over the past 27 years, each one larger and taller than the one before. The current Tenter House building is still standing and substantial demolition work has not begun. There is an extant planning permission for an 18-storey building ("2020 scheme"), which the applicant suggests should be considered as having been built for the purpose of determining daylight/sunlight but demolished for the purpose of calculating carbon impact.

The problem of overlapping planning permissions and developers "picking and choosing" between elements of consented schemes is well known. In our view the City should avoid side-stepping democratically determined policy at national London-wide and City levels on Whole Life Carbon. To suggest that the existing Tenter House has been demolished under the current permission for an 18-storey tower on the site and that therefore there is a near zero carbon to consider in the demolition for this new application is a fallacy. Allowing destructive plans for a 22-storey tower to go ahead without considering the full carbon effect and the potential for retrofit is both outdated and contrary to policy at all levels of the planning hierarchy.

The applicant's suggestion that this will allow the City to claim an additional £5m in CIL, because the existing 11-storey building will have been demolished at the time of the planning decision, strikes us as highly unlikely as the building is very visibly still standing. The suggestion that, by enabling City Point Plaza to be levelled at the eastern edge, this will result in £4.65m of benefit and 186m² extra "open space" is equally questionable. Neither of these financial calculations offset the damage to carbon, townscape, amenity and heritage from this scheme.

Our objection to the application is based on the following:

The WLCA does not include demolition, in breach of the NPPF, London Plan and City guidance.

Unacceptable loss of daylight and sunlight due to the excessive height of the development.

The size/scale of the scheme which is disproportionate and over-dominant in the context of the Barbican's listed status, the five neighbouring Conservation Areas, the views of St Paul's Cathedral from the river and the impact on heritage and townscape overall.

The potential for excessive noise pollution from the roof terraces.

Light pollution from artificial lighting at night.

The inadequacy of traffic and servicing arrangements.

Demolition – and the unexplored potential for retrofit

The applicant's Whole Life Carbon Assessment (WLCA) takes as its starting point a cleared site, even though the current building has not been demolished. The requirement set out in the London Plan (and the emerging City Plan 2040) is to "take into account any carbon emissions associated with pre-construction demolition". We are concerned, therefore, that this and the NPPF requirements to help "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (para 157) and for new development to be planned for in ways that "can help to reduce greenhouse gas emissions" are being side-stepped.

In order to develop this scheme, the existing Tenter House has to be demolished. That is a matter of fact. We object strongly to the acceptance of a WLCA which completely ignores the carbon emissions associated with the demolition of the existing building.

Daylight/Sunlight impact

Suitable daylight/sunlight data has not been provided by the applicant. There has been no response to our request for "*the Daylight, Sunlight and Overshadowing Report to include the visual depiction of the Transient Shadow Results, on 20 March, 20 June and 21 December - on an hourly basis. The analysis should show the pre-existing condition and the proposed condition, and further consider the cumulative impact of Tenter House and 21 Moorfields on the residential properties to the west of the site*". The 2024 reports do not appear consistent with those used in the equivalent 2020 documents and there is not enough detail to reassure consultees that the impact of the scheme is as presented.

Baselining against a cleared site and the existing 11-storey building, would enable neighbours and the local planning authority to fully assess the impact. Instead, applicants have only considered the impact of the extra four storeys over the consented 2020 scheme (para 2.6 of the daylight/sunlight assessment). In our view applicants have not shown in adequate detail the cumulative impact from developments completed since the previous scheme was consented (such as 21 Moorfields).

The applicant also claims that the impact will not be noticeable because of the Willoughby House balconies (para 1.4). By using models of the impact of balconies, rather than real-life measurements, as an excuse to reduce daylight to neighbouring homes enables real harm to residential amenity.

Even in the absence of data we have confidence in, it is apparent that the additional height of this new scheme will have a significant adverse effect on neighbouring flats. This cannot be mitigated in any other way than reducing the height of the proposed development.

Homes need a decent amount of daylight and sunlight and it shouldn't be reduced below reasonable levels simply because of technicalities in the guidelines: the reductions to the occupants are real and, as City policy recognises, loss of light in a home is more significant than in an office. Current proposals breach DM10.7 in the current Plan and HS3 in the emerging City Plan 2040.

Full and accurate information and a clear picture of the difference between what is on site now and what is proposed should be publicly available before consultation closes and a decision is taken on this scheme.

Size/scale - disproportionate and over-dominant

During consultation, the applicants received a great deal of feedback that this scheme is disproportionate and over-dominant in the context of the listed Barbican Estate and other heritage assets such as Lutyens House, the five neighbouring Conservation Areas, the immediate townscape and the strategic views of St. Paul's Cathedral. We can see no evidence that consultation responses have been considered in the scheme's evolution in any way.

All previous replacement and infill buildings along Moor Lane, from Ropemakers Street to Fore Street, respected the shoulder height of the opposite Barbican buildings. From here additional building mass was developed towards Moorfields, away from the estate: on one hand to create a consistent building height along the street and on the other to mitigate the buildings' impact on residential amenities. Moor Place at no. 1 Fore Street, completed in 2014, respectfully increased its height at a shallow angle towards the east of the site. The recently completed Deutsche Bank at 21 Moorfields followed suite, however, due to a lack of a clear language and building shapes, did so less successfully.

In contrast, the proposed seven-storey block on top of the 15-storey base of the new Tenter House transgresses the established development height of its neighbours away from the Barbican, placing substantial mass ever closer to the estate. The proposal will further close the gap between 21 Moorfields and Citypoint, thus creating an over 80-metre-high continuous wall of tall buildings between London Wall to the south and Ropemakers Street to the north.

The addition of the encroaching 22-storey block by itself and in context of its neighbouring buildings, will appear out of character and overbearing. The creation of a 'terrace of tall buildings' will be detrimental to the townscape and setting of the Grade II Barbican Estate, and it will harm close-up and wider views from the estate and its Grade II* listed landscape and gardens.

Terraces, overlooking, noise and residential amenity

As the City recognised with its own development proposal for London Wall West, terraces directly opposite residents' bedrooms and living rooms, as here, damage residential amenity. As with Londo Wall West, west-facing terraces should either be taken out of the scheme or limited by condition to restrict use after 6pm on weekdays, and none at all on weekends and Bank Holidays:

41. Hours of use (roof terraces) (C)

The roof terraces hereby permitted shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, 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.

Traffic, servicing and noise

Tenter House has never been serviced from Moor Lane, which is a strategic cycle route, an important pedestrian north-south route, a "healthy street" for traffic management and a quiet residential street. We object to the proposal to route 88 deliveries a day including at weekends down Moor Lane, particularly as servicing yard is not big enough for vehicles to turn around and therefore will result in noisy reversing. This contravenes the City's current plan policy DM 16.5 as well as Policy D14 of the London Plan. In the 2020 scheme, the City insisted on a servicing yard big enough for lorries to turn round. If it was crucial then, it is crucial now.

Bins to be inside the servicing yard at all times

The applicant is not clear on whether waste will be stored on the lower ground adjacent to the servicing yard (4.3) or to the rear of the servicing yard (4.2). Bins and compactors generate a lot of noise – they need to be inside the building at all times including when waste collection lorries service the building, as with all the other developments locally. This is a residential street, and neighbouring homes need to be protected from unacceptable noise.

Light at night – automated blinds as well as PIR controls

The City's much-publicised Lighting Strategy and SPD should be applied in full to avoid the high level of light pollution which would otherwise unacceptably affect the quiet enjoyment of neighbouring homes which City and London-wide planning policy acknowledges as "light-sensitive" usage. Experience of other developments shows that automated blinds are the most appropriate mitigation for such pollution. This should be secured by condition.

Cultural and community component

The applicant's proposed offer out-of-hours use of a meeting room (and not even free of charge) as the community and cultural contribution of this scheme to an area recognised as a strategic cultural quarter for London is laughably inadequate.

In conclusion, we note that when the previous (2020) scheme was approved, the Planning Department accepted that the proposed building would have a "significant impact" on the appearance of City Point Plaza and result in reduced levels of daylight and sunlight even though the scale and massing of that scheme corresponded to the height of 21 Moorfields. This new scheme is substantially bigger and nearer to its neighbours, harming views, homes and heritage assets in a way its predecessor did not.

Yours sincerely

Peter Jenkinson and Brenda Szlesinger

Co-Chairs, Barbican and Golden Lane Neighbourhood Forum



Representing the interests of Barbican Residents

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

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

7th May 2024

For the attention of Ms Amy Williams, Senior Planning Officer

Dear Ms Williams

Ref: Planning reference number: 24/00209/FULMAJ; Tenter House 45 Moorfields London EC2Y 9AE

We are writing on behalf of the Barbican Association, a Recognized Tenants' Association representing the 4000+ residents of the Barbican Estate, to **object** to the above application for the *“Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building [34,880sq.m GIA], with two ground floor retail units, community floorspace at first floor level, new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]”*.

Our objections to this application focus on the impact of the proposals principally on the significant loss of residential amenity this development would cause - in particular 1) the loss of daylight and sunlight due to the unacceptable increase in height and mass 2) the consequent potential for light pollution 3) the potential for noise disturbance from the proposed terraces and 'woodland' and 4) the unacceptable and unworkable access, entry and servicing routes.

We have additional concerns on the impact of the proposals on townscape and heritage.

We would also reiterate our concerns regarding the deficits in both the process and information provided in the application, principally regarding the Whole Life Carbon Assessment and the Daylight, Sunlight and Overshadowing Reports.

Loss of residential amenity

In terms of height, the current Tenter House is 11-storeys high with a height of 74.9m. The proposed development will be part-14, part-22 storeys, totalling a maximum height of 85.8m (99.9m AOD). This means that it will be considered and assessed as a tall building in accordance with the City of London's definition. The previously consented scheme in 2020 was for an 18-storey building on the site giving

a height of 87.9m AOD. Hence the proposed new building will be 12m taller than the previously consented scheme at its highest point and over 20m higher than the existing building.

In terms of floorspace, the development will provide 34,880sqm of office floorspace – some 8,477sqm more than the previously consented scheme of 26,403sqm. Hence whilst the applicant states that *“The overall height and scale of the Proposed Development is consequently broadly the same as the Permitted 2020 Scheme”*, this is evidently not the case. Whilst we accept that this current application includes a greater variation in volume, height and massing across the building than the previously consented scheme, a 32% increase in mass and a 14% increase in height can hardly be described by any stretch of the imagination as being *“broadly the same”*. We also note that the commercial floorspace of the current Tenter House is 15,465sqm indicating that the mass of the proposed new development will be 2.25x that of the existing building.

Moreover, previous replacement buildings along Moor Lane, from Ropemakers Street to Fore Street, respected the shoulder height of the opposite Barbican buildings. Any additional building mass was developed towards Moorfields, away from the estate: on the one hand this created a consistent building height along the street and on the other it mitigated the buildings’ impact on residential amenities. The proposed development makes no attempt to do that, making it out of keeping with the surrounding townscape.

Loss of Daylight and Sunlight; Overshadowing

Our email to you of 2nd May 2024 voiced our concerns that the City of London is taking the applicant’s word for it that the extra height of the proposed building will have no effect on residents in the near vicinity – in particular those in Willoughby House. A 20m + increase in the height of the building will inevitably have an adverse impact on the level of daylight and sunlight received by neighbouring properties as will the potential for overshadowing.

Whilst the major impact will indeed be felt by residents in Willoughby House, we would advise that the additional height will also block daylight and sunlight to all of the west facing residential blocks in the Barbican in the vicinity of Moor Lane including Gilbert House and Speed House.

Revised report urgently required

We advised in our email to you of 2nd May 2024 that the applicant’s Daylight, Sunlight and Overshadowing Report failed to provide sufficient detail as to the impact of the proposed building on neighbouring properties. A revised report is now urgently required which must include the visual depiction of the Transient Shadow Results, on 20 March, 20 June and 21 December - on an hourly basis. The analysis should also show the pre-existing condition and the proposed condition, and further consider the cumulative impact of Tenter House and 21 Moorfields on the residential properties to the west of the site.

Over and above the omission of proper analysis, we also pointed out that the "baseline" for the Daylight and Sunlight report (para 2.6 of part 1 of the Daylight and Sunlight assessment) isn't the existing building but against a cleared site: *"This report has, therefore, assessed:*

*a. the likely effects of the Proposed Development against a baseline of a cleared application site; and
b. the likely effects arising in the context of a cleared site against the likely effects identified as a result of development of the site in accordance with the 2020 Permission (referenced throughout as the "Permitted 2020 Scheme").*

How can it be possible that the building that currently exists is not being used as a baseline? Surely the proposed new development should be assessed against the cleared site and the existing 11-storey

building NOT against the cleared site and an imaginary 18 storey one. We would again urge the planning department to challenge the applicant on this sleight of hand.

Impact of balconies

The applicant also claims that the impact will not be noticeable because of the Willoughby House balconies (para 1.4) - thereby breaching guidelines with the apparent consent of the City. The Barbican Association has long argued that allowing developers to reduce daylight to residences using the existence of balconies as an excuse does real harm to residential amenity. The point about daylight and sunlight is that residences need a decent amount of daylight and sunlight and it shouldn't be reduced below reasonable levels simply because of technicalities in the guidelines: the reductions to the occupants are real. Moreover, it is not unreasonable for residential flats to have balconies: they provide residential amenity.

In this regard we find it hard to accept the information provided on this issue in the applicant's Daylight, Sunlight and Overshadowing Report. This document makes reference to the proximity of Willoughby House to the site – but claims to have “satisfactorily addressed” any negative impact of the proposed development. It claims that *‘Whilst the Proposed Development will give rise to some minor reduction in daylight and sunlight to Willoughby House these reductions are considered to be so minor as to be unnoticeable particularly as the reductions identified are principally the result the presence of very deep overhanging projections above the windows in Willoughby House itself’*.

The Report continues: *‘It is therefore clear that it is the architectural features of Willoughby House itself that are the principal factor in the relative loss of light as opposed to there being any overdevelopment.....The windows would experience no more than a 13% reduction which clearly illustrates that it is the presence of the balcony, rather than the bulk and mass of the proposed scheme, that is the principal factor for the relative loss of light. Subsequently, the VSC transgressions are solely a consequence of the overhanging projections’*.

We would question how balconies on part of a Grade II listed building, which was completed in 1971 and is located in an important and historic Conservation Area, can be at fault for the significant loss of light (and a loss of 13% is indeed significant) caused by the planned increase in height of this proposed building located on the opposite side of Moor Lane?

We would remind that this subject is referred to in the current Local Plan section 3.10.41 which states “The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments.....When considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals. Where appropriate, ***the City Corporation will take into account unusual existing circumstances, such as development on an open or low rise site and the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive.***” We would therefore suggest that City Corporation takes heed and follows its own guidelines on this subject and applies them to this application.

Cumulative effect of recent developments

Again, referring to the current Local Plan section 3.10.41 above, you will note that it states: ***“When considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals”***. There have been a number of significant new developments around the Moor Lane area over the past few years – including the Heron Building, 22 Ropemaker Street, City Point, 21 Moorfields, WeWork, London Wall Place. We urge the planning committee to take into account the cumulative effects of these developments together with the increased height and mass proposed in this current application regarding Tenter House.

Light pollution

The increase in height and mass of the proposed new Tenter House gives rise to serious concerns over light pollution. Policy HL3 of the current City Plan Noise and light pollution states that *“Developers must consider the noise and lighting impacts of their development..... 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..... New development must include suitable mitigation measures such as attenuation of noise or light spillage or restrictions on operating hours.....”***

Policy D9 of the London Plan with regard to Tall Buildings also re-confirms this....” *buildings should not cause adverse reflected glare.....**buildings should be designed to minimise light pollution from internal and external lighting....”***

Light pollution at night is unacceptable and is a significant issue for residents. We would therefore recommend a strict and enforceable planning condition to be attached to any consent to this application for the compulsory fitting of automated blinds to the west facing windows and the independently verified commissioning of automated sensor systems to turn lights off after a certain time.

Noise pollution from terraces

The submitted documents accompanying this application talk of *“the terraces surmounting the east and west volumes will be connected by balconies around the edge of the central volume”*. Indeed, the plans show that there are over 2000sq m of balconies and terraces on the proposed building - 60sq m on levels 2, 4, 6, 8, 10 and 69sq m on level 12. The ‘design concept’ of the large roof terrace on level 14 even *‘visualises a woodland in the sky’*.

We trust that the Planning Officers are aware that the bedrooms of the 145 flats in Willoughby House face Moor Lane. The issues of noise pollution and the use of terraces and viewing galleries are covered by both the London and current City plans.

Policy D14 of the **London Plan** states that noise should be managed by *‘avoiding significant adverse noise impacts on health and quality of life’*. Policy DE5 of the current City Plan states that *“**Roof terraces will be encouraged where..... There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity.....”***

The potential for noise pollution in a location close to such a densely populated residential area is significant and has the potential to have a significant adverse impact on residential amenity – directly in contravention to both the London and City Plans. As has been the case in all of the previous development applications submitted in the vicinity in the area, **we request the setting of strict and enforceable conditions at this planning stage as to the use and timing of the proposed terraces and “woodland”**. Terraces should be closed at 6pm on weekdays and at all times at weekends and Bank Holidays (in this we have followed the recommendations of the environmental health team made in relation to the London Wall West scheme).

Unacceptable access, entry and servicing routes

The Delivery and Service Plan shows all vehicles from any direction accessing New Union Street from Moor Lane and leaving the site onto Moorfields. Those from the south come in from Fore Street, those from the east along Silk Street and those from the west along Ropemaker.

Given that some 88 deliveries are expected every day to the site – in addition to the 100+ deliveries every day to City Point – it is clear that Moor Lane is unlikely to be the quiet, greened street that was originally promised. Please note that Moor Lane is currently a quiet cycleway and the 2040 plan proposes it as a major north south pedestrian route. Neither of these uses are compatible with a run for delivery lorries

The access route to the service yard should be from and to Moorfields rather than Moor Lane given the proximity of the proposed service routes to many residential premises. Moorfields is little used.

It also appears that the servicing yard is too small for lorries to turn round in which means that they will either have to reverse out onto New Union Street or reverse into the yard. This is inappropriate both for such a densely populated residential area and for the many users of the strategic cycleway along Moor Lane. As well as creating excessive noise, this is both dangerous and unworkable and will create significant noise and disruption in the area. It also breaches City policy, which requires that vehicles should be able to turn inside a service yard in order to be able to drive out frontwards – and not have to reverse.

The service yard should be enlarged to allow lorries to turn and prevent this.

Unclear strategy regarding Waste

We would also suggest that the waste strategy is unclear and somewhat contradictory. At Point 4.3 the documents state that waste will be stored at lower ground level adjacent to the servicing yard but Point 4.2 states that refuse bins will be stored at the rear of the servicing yard. This throws up the very real potential for significant noise pollution given that the noise of throwing waste into bins – particularly solid items – can carry a long way.

The Waste Strategy needs to be clear that no bins or compactors should be stored outside of the servicing yard.

Impact on townscape and heritage

Policy HC1 of the London Plan states that *“proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings”*.

The applicant’s Townscape, Heritage and Visual Impact Report February 2024 states at Point 4.24 that *“The Site is not located within any designated conservation areas, however the Proposed Development would be visible from within a number of conservation areas and has the potential to affect the heritage significance of those conservation areas as a consequence....”* It also states at 2.67 that *“Development on the Site would potentially be visible in direct relation to St Paul’s Cathedral in two LVMF views (LVMF 8A.1 Westminster Pier and LVMF 16B.1/2 Gabriels’s Wharf)...”*

We are therefore disappointed that the excessive height of the scheme not only damages the townscape locally but also affects views of St Paul’s from the river which is in contravention of Policy CS13 which exists *“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....”*

Whole Life Carbon Assessment ignores the emissions from demolition

We have already voiced our concerns over these matters in our email to you of 2nd May 2024 so will not repeat them in detail.

In summary however we would like to bring to your attention once again to the **Whole Life Carbon Assessment (WLCA)** submitted by the applicant which completely ignores the carbon emissions associated with the demolition of the existing building as this had been granted under a previously granted planning consent. This - somewhat disingenuously – is clearly seeking to evade the City's "retrofit first" policy and completely ignores a very large amount of embedded carbon from its calculations. The London Plan (and indeed the emerging City Plan 2040) makes it clear that this assessment should **“take into account any carbon emissions associated with pre-construction demolition”**. This application rides a coach and horses through this formal planning guidance and it is disappointing that the City of London has chosen to turn a blind eye to it – not least given its supposed focus on reducing carbon emissions.

The following excerpts from a report to the Local Plans sub-committee meeting in April 2023 submitted by Gwyn Richards, CoL Planning & Development Director and Rob McNicol, CoL Environment Department regarding the emerging City Plan 2040 (now out for formal consultation) place the City's lack of adherence to its own policies into sharp relief. The report stated:

- *Policies SI 2 and SI 7 of the London Plan and related London Plan Guidance “Whole Life-Cycle Carbon Assessments” and “Circular Economy Statements” (March 2022) establish strategic policy and guidance. The guidance advises that re-use/retrofit be prioritised over redevelopment. **The City Plan is required to be in general conformity with the London Plan.***
- ***The draft City Plan 2040 currently requires proposals for major development to demonstrate that London Plan targets for carbon emissions have been met on site as a minimum, and that they retain embodied carbon within building structures where feasible....***

By not challenging the applicant's attempt to evade/ignore the recommendations set out in the London Plan and the merging City Plan 2040, it is troubling to observe that the City of London has chosen to ignore adherence to its own policies.

Summary

New planning applications should consider carbon before designing anything, to make sure the most climate-friendly option is built. By claiming that there is very little carbon embedded in this new scheme as the current Tenter House is being demolished under an old planning consent, the City's "retrofit first" policy is being sidestepped in a most climate-unfriendly way.

This proposed 22 storey tower is surrounded not just by several important Conservation Areas but also hundreds of people's homes and is therefore unsuitable for such a tall, bulky new build. It pokes up over the historic skyline. It cuts out daylight and sunlight for people who live next door, and who will also be overlooked by roof terraces. 88 lorry deliveries are projected to arrive every day, including weekends, along a narrow residential street and strategic cycle route.

For all of the many reasons expanded on in this representation we would therefore request that this application be refused in its current form.

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-Committee

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

GREATER LONDON AUTHORITY

Good Growth

Amy Williams
City of London Corporation
By Email

Our ref: 2024/0215/S1
Your ref: 24/00209/FULMAJ
Date: 7 May 2024

Dear Amy Williams,

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

Tenter House, 45 Moorfields, London.

Local Planning Authority reference: 24/00209/FULMAJ

I refer to your letter received by the GLA on 19 April 2024 consulting the Mayor of London on the above planning application, under the terms of the Mayor of London Order 2008.

The applicant proposes: *Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. - Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).*

I have assessed the details of the application and, given the scale and nature of the proposals, conclude that the amendments do not give rise to any new strategic planning issues.

Therefore, under article 5(2) of the above Order the Mayor of London does not need to be consulted further on this application. Your Council may, therefore, proceed to determine the application without further reference to the GLA. I will be grateful, however, if you would send me a copy of any decision notice and section 106 agreement.

City Hall, Kamal Churchie Way, London E16 1ZE ♦ london.gov.uk ♦ 020 7983 4000

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Yours sincerely



John Finlayson
Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Sakina Sheikh, Chair of London Assembly Planning Committee
National Planning Casework Unit, DLUHC
TfL



Memo

To Assistant Director (Development Management)
Environment Department

Email [REDACTED]

From Kyri Eleftheriou-Vaus
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date 08/05/2024

Your Ref: 24/00209/FULMAJ

Subject: Tenter House, 45 Moorfields EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14- storey and part 22- storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

SUMMARY OF DEVELOPMENT

The proposed development will provide hot water and heating through air source heat pumps. No generator is proposed.

The site is deemed a medium risk during the construction phase however all sites are considered high risk in the City of London and therefore maximum control measures in line with the City's Code of Practice should be employed, to mitigate against dust and emission releases.

Should the development be approved please attach the following conditions:

Condition M32 NRMM

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

provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason

To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Roof gardens

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.

In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

Compliance with the Clean Air Act 1993

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

Generators and combustion plant

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

From: [REDACTED]
To: [REDACTED]
Subject: FW: 24/00209/FULMAJ; Tenter House 45 Moorfields
Date: 09 May 2024 14:46:58
Attachments: [image001.png](#)
[image002.png](#)

Hi,

Please log and upload the below email as Transport for London comments to the file for 24/00209/FULMAJ, suitably redacted.

Kind regards,
Amy

Amy Williams | she/her
Senior Planning Officer (Development Management and Design)
Development Division
Environment Department
[REDACTED]



Environment Department
City of London Corporation

City of London Corporation | PO Box
270 | London EC2P 2EJ |
www.cityoflondon.gov.uk



From: Paklim Wong [REDACTED] >
Sent: Wednesday, May 8, 2024 5:13 PM
To: Williams, Amy [REDACTED] >
Subject: Re: 24/00209/FULMAJ; Tenter House 45 Moorfields

THIS IS AN EXTERNAL EMAIL

Dear Amy

Re: 24/00209/FULMAJ; Tenter House 45 Moorfields

With regards to the above-mentioned site, TfL offers the following comments:

1. The site is situated close to Moorfields Underground and Liverpool Street Elizabeth Line Station; therefore, prior approval on the proposal's detailed design must be obtained from London Underground Infrastructure team and Crossrail team; this is ensuring that the proposal would not cause adverse impact to TfL rail infrastructure.
2. TfL welcomes that the applicant is committed to provide cycle parking with various type of cycle rack meeting the London Plan cycle parking standards; along with the provision of shower and changing facilities. The final approval of cycle parking details shall be secured by conditions.
3. TfL welcomes that the site would be car free, and the underground car parking would be removed. However, the applicant shall demonstrate how disabled users would be accommodated, in line with London Plan Parking policy.
4. TfL welcomes the removal of the underground car park ramp, enabling new open public realm provided within the City Point Plaza area, and enhance street environment and permeability of the site.
5. It is welcomed that an off-street servicing yard will be provided in line with London Plan policy. TfL also supports that consolidated servicing will be introduced as part of the Delivery & Servicing Strategy. While servicing will be planned during the off-peak; it is recommended that Night time servicing shall be considered where possible to ease day time traffic level; as well as servicing by bikes should also be promoted and encouraged.
6. Regarding trip generations, the submitted TA recognise that the proposed development would generate lesser number of trips compare to the existing development; TfL requires clarify on how this would be achieved, and floor area details of the existing and proposed development should be provided for clarity.
7. It is welcomed that an Active Travel Zone Assessment has been undertaken, five routes have been studied. It is noted that route to Barbican may require attention on improving security; and route to Bank Station have highlighted a number of improvement opportunities such as installing more CCTVs and possible measure to reduce traffic along the route to make walking more attractive. The ATZ also notes there are number construction works being undertaken on various route which may impact pedestrian/ cyclists experience to/ from the site. The city is encouraged to secure a package of improvements toward local public realm, walking and cycling where appropriate.
8. It is noted that a Pedestrian Level of Comfort assessment has been undertaken; on the assumption that the proposal would generate less trips that the existing proposal, it is concluded that there will be improvements to Pedestrian LOS on streets in the vicinity of the site.
9. On the basis that the latest proposal would have no material highway and transport capacity impact over and above the 2020 (17/01050/FULMAJ) consent, TfL therefore would not seek additional mitigation against local public transport service and highway capacity.

10. A Full Construction Management Plan and Construction Logistics Plan shall be submitted for City's approval in consultation with TfL prior to commencement.
11. All highway and transport improvements secured under the 2020 (17/01050/FULMAJ) consent shall be carried forward and be re-secured by s106 planning obligations.
12. The final Cycle Promote Plan and Travel Plan should be secured s106 planning obligations.

In conclusion, while TfL is principally agree that the proposal would not result in an unacceptable impact to the TLRN and surrounding highway network; clarify is needed to confirm that the proposal would result in lesser trip impact than the existing development; and the City is recommended to secure improvement toward walking/ cycling and public realm in light of the ATZ finding, along side with cycle parking provision, car free restriction, revised DSP in light of comments, Travel Plan and cycle promotion Plan. Condition should also be secured in relation to construction management and construction logistics arrangement.

Please do not hesitate to contact me if I can be of any further assistance.

Kind regards

PakLim Wong
Planning Officer
Spatial Planning, Transport for London
5 Endeavour Square, Westfield Avenue, Stratford E20 1JN
Email: [REDACTED]

For more information regarding the TfL Borough Planning team, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit

<http://www.tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications?intcmp=3484>

This message has been scanned for malware by Forcepoint. www.forcepoint.com

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

Application Reference: 24/00209/FULMAJ

Site: Tenter House 45 Moorfields London EC2Y 9AE

Case Officer: Amy Williams

Application Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point

Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,701sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

CIL and Planning Obligations

1. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
2. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
3. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
4. CIL contributions and City of London Planning obligations are set out below.

MCIL2

| Liability in accordance with the Mayor of London's policies | Contribution (excl. indexation) | Forwarded to the Mayor | City's charge for administration and monitoring |
|--|--|-------------------------------|--|
| MCIL2 payable | £6,458,896.44 | £6,200,540.59 | £258,355.86 |

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 | £2,630,475.00 | £2,498,951.25 | £131,523.75 |
| City Planning Obligations | | | |
| Affordable Housing | £1,753,650.00 | £1,736,113.50 | £17,536.50 |
| Local, Training, Skills and Job Brokerage | £1,052,190.00 | £1,041,668.10 | £10,521.90 |
| Carbon Reduction Shortfall (<i>as designed</i>) <i>Not indexed</i> | £298,110.00 | £298,110.00 | £0 |
| Section 278 (Evaluation and Design Fee) <i>Not indexed</i> | £TBC | £TBC | £TBC |
| S106 Monitoring Charge | £5,500.00 | £0 | £5,500.00 |
| Total liability in accordance with the City of London's policies | £5,739,925.00 | £5,574,842.85 | £165,082.15 |

City's Planning Obligations

5. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

7

- Highway Reparation and other Highways Obligations (*Highways Schedule of Condition Survey, site access, consents, licences etc*)
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage (Construction)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Travel Plan (including Cycling Promotion Plan)
- Construction Monitoring Cost (£53,820 *First Year of development* and £46,460 *for subsequent years*)
- Carbon Offsetting

- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Section 278 Agreement (CoL)
- Public Routes (*Public Access*)
- Public Realm Space (*Specifications, Public Access & Management Plan*)
- Cultural Implementation Strategy
- Television Interference Survey
- Wind Audit
- Solar Glare
- Creative Workspace (TBC)
- Highways Contribution (towards improvement works along Moorfields - £TBC)
- Dedication of new public highway
- Dedication of permissive path
- Community Meeting Space (Management Plan)
 - Provision of 179sqm (GIA) of community floorspace to be made available to [X] groups during [X hours]

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

Monitoring and Administrative Costs

8. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
9. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.



Historic England

Ms Amy Williams
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00209/FULMAJ
Our Ref: 220630

Contact: Helen Hawkins



24th May 2024

Dear Ms Williams,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023**

Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development)

Recommend Archaeological Conditions

Thank you for your consultation received on 09 April 2024.



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The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact

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.

The Archaeological Desk Based Assessment has been fully revised in line with the comments provided by GLAAS and is now of an acceptable standard. The DBA has illustrated that some impact to archaeological remains will be caused by the redevelopment of the site and therefore archaeological mitigation work is recommended as part of the planning permission.

Although it is likely that demolition will take place under the previous application conditions, the same conditions have been applied here as well, in case there is a change in the programme and all below ground work is carried out under the new permission.

Planning Policies

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. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of



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the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition and a foundation design condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching a condition as follows:

Condition 1 No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

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

Condition 2: Foundation Design ...

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by



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the local planning authority. The development shall be carried out in accordance with the approved details.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins



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Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



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Memo



To Assistant Director (Development Management)
Environment Department
Tele phone [REDACTED]
Email [REDACTED]

From Alexander Carlyon Smith
Environmental Health Officer
Environment Department
Tele phone [REDACTED]
Email [REDACTED]

Date 28/05/2024
Our Ref 24/02230/NPLN
Your Ref PT_AW/24/00209/FULMAJ

Subject Tenter House, 45 Moorfields, London

Thank you for your memorandum and attached drawings etc. For **Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).**

This Department has the following observations and comments to make:-

The following conditions should be applied:

- 14C No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- I11C No live or recorded music that can be heard outside the premises shall be played.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- I18C No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.
- I20C Self-closing mechanisms must be fitted on the doors at street entrances before the Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) use commences and shall be retained for the life of the premises. The doors must not be left open except 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.
- I26 The roof terraces on hereby permitted shall not be used or accessed between the hours of 21:00 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.
- I27 No amplified or other music shall be played on the roof terraces.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- I28 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- M7D (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
- (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
- (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- M1 1G There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

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

- M1 8D 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 Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (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 Sui Generis(Pubs with expanded food provision, hot food takeaways) use/Class E (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.

M1 9C 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.

M2 OD Before the development hereby permitted shall commence, unless otherwise agreed with the Local Planning Authority, the following works shall be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due consideration given to impact of development works (including remediation) on off-site receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events):

- a. a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development.
- b. an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work.
- c. A remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. 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 and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved.

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, to prevent pollution of the water environment, 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.

- M2 1D Prior to occupation and unless otherwise agreed with the Local Planning Authority, a verification report produced in accordance with LCRM and other associated guidance detailing the remediation measures completed and final condition of the site must be submitted to and approved in writing by the Local Planning Authority.
The developer must include a statement to confirm that the site development is safe, suitable for its intended use, and would not be considered under Part 2A of the Environmental Protection Act 1990.

REASON:

To ensure that the development is safe and suitable for its intended use for the future users of the land, neighbouring land, and that risks to controlled waters, property and ecological systems are minimised, in accordance with the Local Plan DM15.8. These details are required prior to occupation in order that appropriate evidence of the remedial works is agreed and accepted by the Local Planning Authority prior to any potential exposure of occupiers or harm to the environment from land contamination.

- M2 2D Should unexpected contamination be identified during development hereby approved, the Local Planning Authority must be notified in writing within five working days. An investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management.
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.

- M2 3D 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.

- M2 4I 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.

- M2 5J 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.*

M2 No cooking shall take place within any A5 Sui Generis (Pubs with expanded food
7B provision, hot food takeaways) use/Class E (Restaurant) unit 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.

Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.

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

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.

STANDARD INFORMATIVES

14C

The Environment Department (Environmental Health Team) must be consulted on the following matters:

- (a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.
- (b) Installation of engine generators using fuel oil.
- (c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.
- (d) Alterations to the drainage and sanitary arrangements.
- (e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:
the identification, encapsulation and removal of asbestos in accordance with a planned programme;
provision for window cleaning (internal and external) to be carried out safely.
- (f) The use of premises for the storage, handling, preparation or sale of food.
- (g) Use of the premises for public entertainment.
- (h) Approvals relating to the storage and collection of wastes.
- (i) The detailed layout of public conveniences.

- (j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.
- (k) The control of noise from plant and equipment;
- (l)

15D

Air Quality

(e) **Compliance with the Clean Air Act 1993**

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

Boilers and CHP plant

- (f) The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO_x emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.
- (g) All gas Combined Heat and Power plant should be low NO_x technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.
- (h) When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Environment Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Environment Department is satisfied

that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

- (i) Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

Standby Generators

- (j) Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.
 - (k) There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.
- (o) The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Environment strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Alexander Smith
Environmental Health Officer



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Telephone [REDACTED]

Email [REDACTED]

Date 31 May 2024

Our Ref DS/SUDS24/0023

Your Ref PT_AW /24/00209/FULMA J

Subject Tenter House 45 Moorfields London EC2Y 9AE

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

The Lead Local Flood Authority has reviewed the Flood Risk Assessment P2 for the above application and would recommend the following conditions should the application be approved:

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

- (a) Fully detailed design, schematic and layout drawings for the proposed SuDS components including but not limited to: rainwater harvesting, attenuation systems (including green-blue roofs and the above ground tank), rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance including silt removal; surface water flow rates shall be restricted to no greater than 2.59 l/s from the building, provision should be made for an attenuation volume capacity capable of achieving this, the area allowed to free drain shall be no greater than 1390 square meters;
- (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) A Lifetime Maintenance Plan for the SuDS system to include:
 - A full description of how the system would work, it's aims and objectives and the flow control arrangements;
 - A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk



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

Date 07 June 2024
Our Ref 24/02230/NPLN
Your Ref 24/00209/FULMAJ

Subject Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,701sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

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

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

Roof terraces hereby permitted shall not be used or accessed between the hours of 1800

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

hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency.

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

No amplified or other music shall be played on the roof terraces.

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

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the commercial kitchen uses. The details approved must be implemented before the individual commercial kitchen uses are implemented.

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

No cooking shall take place within any commercial kitchen units 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. 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.

The restaurant/bar 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 nearby residents, adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Details of the design and acoustic properties of the loading bay door shall be submitted to and approved by the Local Planning Authority before any works thereby affected are begun and shall be maintained for the life of the building.

REASON: To ensure a satisfactory external appearance and to minimise disruption to nearby residents in accordance with the following policies of the Local Plan: DM10.1 and DM21.3.

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

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

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

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

There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and

arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

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

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.

(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

Reason: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

M19C 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.

Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

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.

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.

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.

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.

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.

Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.

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

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.

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

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..

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

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

Regards

Donal Rooney

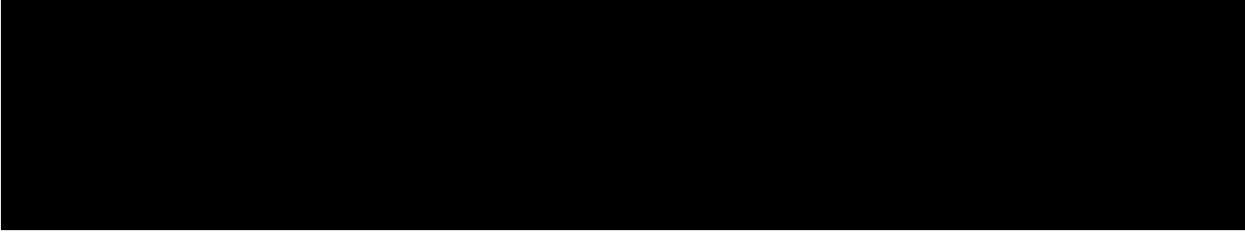
Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ



From: Paklim Wong
Sent: Tuesday, June 11, 2024 3:12 PM
To: Williams, Amy <[REDACTED]>
Subject: RE: 24/00209/FULMAJ; Tenter House 45 Moorfields

THIS IS AN EXTERNAL EMAIL

Dear Amy

Thank you for forwarding me the applicant's response to my earlier comments. I have now reviewed it have the following observations:

1. The applicant has now provided clarification on trip generation, and it is concluded that the likely increase in trip rate is unlikely to cause a significant material impact over and above the consented proposal to the local highway/ transport network.
2. I also considers that other matters have been addressed and relevant planning obligations or conditions should be secured accordingly.
3. Any planning conditions/ obligations (if Any) in relation to London Underground secured in previous consented proposal should be carried over.

Kind regards

PakLim Wong
Planning Officer
Spatial Planning, Transport for London
5 Endeavour Square, Westfield Avenue, Stratford E20 1JN

From: Williams, Amy <[REDACTED]>
Sent: 31 May 2024 21:35
To: Paklim Wong
Subject: RE: 24/00209/FULMAJ; Tenter House 45 Moorfields

Dear PakLim,

Thank you for the below.

Please see attached response document produced by the applicant, as well as area schedules.

Please can you let me know if this now acceptable?

Kind regards,
Amy

Amy Williams | she/her
Senior Planning Officer (Development Management and Design)
Development Division
Environment Department



Environment Department
City of London Corporation

City of London Corporation | PO Box
270 | London EC2P 2EJ |
www.cityoflondon.gov.uk



From: Paklim Wong
Sent: Wednesday, May 8, 2024 5:13 PM
To: Williams, Amy [REDACTED]
Subject: Re: 24/00209/FULMAJ; Tenter House 45 Moorfields

THIS IS AN EXTERNAL EMAIL

Dear Amy

Re: 24/00209/FULMAJ; Tenter House 45 Moorfields

With regards to the above-mentioned site, TfL offers the following comments:

1. The site is situated close to Moorfields Underground and Liverpool Street Elizabeth Line Station; therefore, prior approval on the proposal's detailed design must be obtained from London Underground Infrastructure team and Crossrail team; this is ensuring that the proposal would not cause adverse impact to TfL rail infrastructure.
2. TfL welcomes that the applicant is committed to provide cycle parking with various type of cycle rack meeting the London Plan cycle parking standards; along with the provision of shower and changing facilities. The final approval of cycle parking details shall be secured by conditions.
3. TfL welcomes that the site would be car free, and the underground car parking would be removed. However, the applicant shall demonstrate how disabled users would be accommodated, in line with London Plan Parking policy.
4. TfL welcomes the removal of the underground car park ramp, enabling new open public realm provided within the City Point Plaza area, and enhance street environment and permeability of the site.
5. It is welcomed that an off-street servicing yard will be provided in line with London Plan policy. TfL also supports that consolidated servicing will be introduced as part of the Delivery & Servicing Strategy. While servicing will be planned during the off-peak; it is recommended that Night time servicing shall be considered where possible to ease day time traffic level; as well as servicing by bikes should also be promoted and encouraged.
6. Regarding trip generations, the submitted TA recognise that the proposed development would generate lesser number of trips compare to the existing development; TfL requires

clarify on how this would be achieved, and floor area details of the existing and proposed development should be provided for clarity.

7. It is welcomed that an Active Travel Zone Assessment has been undertaken, five routes have been studied. It is noted that route to Barbican may require attention on improving security; and route to Bank Station have highlighted a number of improvement opportunities such as installing more CCTVs and possible measure to reduce traffic along the route to make walking more attractive. The ATZ also notes there are number construction works being undertaken on various route which may impact pedestrian/ cyclists experience to/ from the site. The city is encouraged to secure a package of improvements toward local public realm, walking and cycling where appropriate.
8. It is noted that a Pedestrian Level of Comfort assessment has been undertaken; on the assumption that the proposal would generate less trips than the existing proposal, it is concluded that there will be improvements to Pedestrian LOS on streets in the vicinity of the site.
9. On the basis that the latest proposal would have no material highway and transport capacity impact over and above the 2020 (17/01050/FULMAJ) consent, TfL therefore would not seek additional mitigation against local public transport service and highway capacity.
10. A Full Construction Management Plan and Construction Logistics Plan shall be submitted for City's approval in consultation with TfL prior to commencement.
11. All highway and transport improvements secured under the 2020 (17/01050/FULMAJ) consent shall be carried forward and be re-secured by s106 planning obligations.
12. The final Cycle Promote Plan and Travel Plan should be secured s106 planning obligations.

In conclusion, while TfL is principally agree that the proposal would not result in an unacceptable impact to the TLRN and surrounding highway network; clarify is needed to confirm that the proposal would result in lesser trip impact than the existing development; and the City is recommended to secure improvement toward walking/ cycling and public realm in light of the ATZ finding, along side with cycle parking provision, car free restriction, revised DSP in light of comments, Travel Plan and cycle promotion Plan. Condition should also be secured in relation to construction management and construction logistics arrangement.

Please do not hesitate to contact me if I can be of any further assistance.

Kind regards

PakLim Wong
Planning Officer
Spatial Planning, Transport for London
5 Endeavour Square, Westfield Avenue, Stratford E20 1JN

For more information regarding the TfL Borough Planning team, including TfL's

Transport assessment best practice guidance and pre-application advice please visit

<http://www.tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications?intcmp=3484>

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Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Environment Department

Tele phone [REDACTED]

Email [REDACTED]

Date 13 September 2024

Our Ref DS/FS24/0035

Your Ref PT_A W /24/00209/FULMA J

Subject Tenter House 45 Moorfields London EC2Y 9AE

In response to your request for comments in relation to the application the District Surveyors Office has the following comments to make:

I have reviewed the fire statement and have no comments. I consider that the application meets policies D5 and D12.

From:
To:
Cc:
Subject: 24/00209/FULMAJ - Tenter House 45 Moorfields
Date: 15 September 2024 00:45:30

Hi Amy

The proposed waste storage and collection facilities indicated on Drawing No. P0199 Rev B and as outlined in the Delivery, Servicing and Waste Management Plan, Feb 2024, and the Transport Assessment Addendum, Aug 24, are adequate for this proposal. Therefore, this division, will not raise any objection to this application.

Thanks

Vimal

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

From:
Sent: Monday, September 9, 2024 9:57 AM
To: Varma, Vimal; Turner, Lee
Subject: Planning Application Consultation: 24/00209/FULMAJ

Dear Sir/Madam

Please see attached consultation for Tenter House 45 Moorfields London EC2Y 9AE .
Reply with your comments to HYPERLINK "<mailto:PLNComments@cityoflondon.gov.uk>"
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

From:
To:
Cc:
Subject: FW: 24/00209/FULMAJ - Tenter House 45 Moorfields London EC2Y 9AE
Date: 17 September 2024 13:01:18
Attachments:

THIS IS AN EXTERNAL EMAIL

Hi Amy
Thanks for reconsulting me on this application. The revised proposals have not affected my original advice, which I have attached for reference
Regards
Helen

Helen Hawkins MCIFA

Archaeology Adviser, City of London

Greater London Archaeology Advisory Service (GLAAS)

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill. London EC4R 2YA

www.historicengland.org.uk

Please send all your planning and pre-planning archaeology consultations to:
e-glaas@historicengland.org.uk

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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: 09 September 2024 09:54

To: E-Glaas
Subject: 24/00209/FULMAJ -
Tenter House 45 Moorfields
London EC2Y 9AE

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir/Madam

Please see attached consultation for proposed works involving a material change to a building which is listed grade NO.

The application and associated documents are available for viewing at
<http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S9IXTQFHIBE00>

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Amy Williams

OUR REF: 24/00209/FULMAJ

ADDRESS: Tenter House 45 Moorfields London EC2Y 9AE (Grid Reference: 532686, 181715)

PROPOSAL: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

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Corporation of London Department of Planning &
Transportation PO Box 270 Guildhall London EC2P 2EJ
18 September 2024

Our DTS Ref: 75854 Your Ref:
24/00209/FULMAJ - Amended App

Dear Sir/Madam

Re: TENTER HOUSE , 45 MOORFIELDS, LONDON, -, EC2Y 9AW

Waste Comments

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

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe 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 and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit

from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Water Comments

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

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme

for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe 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 and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

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

Thames Water are currently working with the developer of application 24/00209/FULMAJ to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve the first 19,00sqm of office space at 1.5l/s but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the first 19,00sqm of office space at 1.5l/s until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple
Lodge STW, Denham Way, Rickmansworth,
WD3 9SQ Tel:020 3577 9998 Email:
devcon.team@thameswater.co.uk



It's everyone's water



Your ref:
My ref: 24/06285/OBS

Please reply to: Nikki Mitchell
Tel No: [REDACTED]
Email: southplanningteam@westminster.gov.uk

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

18 September 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 24/06285/OBS **Application Date:**
Date Received: 09.09.2024 **Date Amended:** 09.09.2024

Plan Nos: Consultation letter from City of London dated 9 September 2024.

Address: Tenter House, 45 Moorfields, City Of London, London

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ.

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Yours faithfully



Deirdra Armsby
Director of Town Planning & Building Control

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



Note:

- 3f The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



GREATER LONDON AUTHORITY

Good Growth

Amy Williams
City of London
By Email

Our ref: 2024/0479/NSI
Your ref: 24/00209/FULMAJ
Date: 20 September 2024

Dear Amy Williams

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
45 Moorfields, London EC2Y 9AE
Local Planning Authority reference: 24/00209/FULMAJ

I refer to your letter received by the GLA on 10 September 2024 consulting the Mayor of London on the above planning application, under the terms of the Mayor of London Order 2008.

The applicant proposes: *Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].*

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

The GLA has been consulted on the application due to the provisions of Article 4 of the Mayor of London Order (Consultation required by Secretary of State direction), as the development is within the following Protected Vista and exceeds its threshold plane:

Protected vista 8: Westminster Pier to St Paul's Cathedral

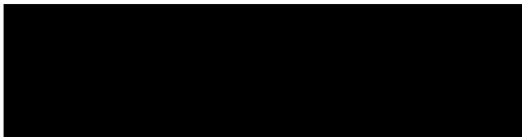
City Hall, Kamal Chunchie Way, London E16 1ZE ♦ london.gov.uk ♦ 020 7983 4000

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

I have assessed the details of the revised application and, given the scale and nature of the proposals, conclude that the proposals would not adversely affect the above Protected Vista, and therefore the proposals do not give rise to strategic planning issues.

Therefore, under article 5(2) of the above Order the Mayor of London does not need to be consulted further on this application. Your Council may, therefore, proceed to determine the application without further reference to the GLA. I will be grateful, however, if you would send me a copy of any decision notice and section 106 agreement.

Yours sincerely



John Finlayson

Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
TfL

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

Application Reference: 24/00209/FULMAJ

Site: Tenter House 45 Moorfields London EC2Y 9AE

Case Officer: Amy Williams

Application Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

CIL and Planning Obligations

1. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
2. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
3. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
4. CIL contributions and City of London Planning obligations are set out below.

MCIL2

| Liability in accordance with the Mayor of London's policies | Contribution (excl. indexation) | Forwarded to the Mayor | City's charge for administration and monitoring |
|--|--|-------------------------------|--|
| MCIL2 payable | £5,835,395 | £5,601,979 | £233,416 |

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 | £2,373,450 | £2,254,778 | £118,673 |
| City Planning Obligations | | | |
| Affordable Housing | £1,582,300 | £1,566,477 | £15,823 |
| Local, Training, Skills and Job Brokerage | £949,380 | £939,886 | £9,494 |
| Carbon Reduction Shortfall (as designed) <i>Not indexed</i> | £265,172 | £265,172 | £0 |
| S106 Monitoring Charge | £4,500 | £0 | £4,500 |
| Total liability in accordance with the City of London's policies | £5,174,802 | £5,026,313 | £148,489 |

City's Planning Obligations

5. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.
- Highway Reparation and other Highways Obligations (*Highways Schedule of Condition Survey, site access, consents, licences etc*)
 - Local Procurement Strategy (*Demolition and Construction*)
 - Employment and Skills Plan (*Demolition and Construction*)
 - Delivery and Servicing Management Plan (*including Consolidation*)
 - Travel Plan (*including Cycling Promotion Plan*)
 - Construction Monitoring Cost (£53,820- *First Year of development and £46,460 for subsequent years*)
 - Carbon Offsetting

- 'Be Seen' Energy Performance Monitoring
 - Utility Connection Requirements
 - Section 278 Agreement (*CoL*)
 - Television Interference Survey
 - Wind Audit
 - Solar Glare
 - Cultural Implementation Strategy
 - Creative Workspace (*Management Plan*)
 - Community Space (*Management Plan*)
 - Open Space Agreement
 - Removal of existing car park ramp
6. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.
7. The scope of the s278 agreement may include, but is not limited to:
- repaving of footways and re-alignment of road to suit new site layout
 - resurfacing of the carriageway
 - provision road markings
 - Provision of disabled parking bays and associated traffic orders
 - Removal of redundant street furniture, if applicable
 - Any highways repair works in the vicinity of the site, upon construction works

Monitoring and Administrative Costs

8. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
9. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Informative – 005B

Informative 005B - CIL

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sqm

Retail £165 sqm

Hotel £140 sqm

All other uses £80 per sqm

These rates are applied to "chargeable development" over 100sqm (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sqm for offices, £150 per sqm for Riverside Residential, £95 per sqm for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: [Download the forms - Community Infrastructure Levy - Planning Portal](#))

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

23/09/2024

EK



Ms Amy Williams
City of London Corporation
Guildhall, PO Box 270
London
EC2P 2EJ

Direct Dial: 020 7973 3765

Our ref: P01575410

25 September 2024

Dear Ms Williams

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

**TENTER HOUSE 45 MOORFIELDS LONDON EC2Y 9AE
Application No. 24/00209/FULMAJ**

Thank you for your letter of 6 September 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Historic England is the Government's advisor on the historic environment and has a statutory role in the planning process. Our role in this site is to assess the impacts on the wider historic environment including the setting of designated heritage assets. This letter only refers to the designated assets and any matters related to non-designated archaeological assets are covered in separate correspondence from my colleague Helen Hawkins.

Significance

St Paul's Cathedral

St Paul's Cathedral is of exceptional architectural and historic significance. It was built in 1675-1710 in the Classical style by Sir Christopher Wren, following the destruction of the medieval cathedral in the Great Fire. In recognition of its national, and indeed international significance, the Cathedral is listed at Grade I.

Key features of the Cathedral that appear in skyline views include its dome, western towers and upper parts of the elevations. In many riverside views, these features are clearly visible and recognisable due to their distinctive form and scale, making a strong contribution to its architectural significance. In many wider London views, the architectural composition of the Cathedral creates a distinctive and recognisable silhouette on the skyline.



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

Telephone 020 7973 3700
HistoricEngland.org.uk

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

The London View Management Framework (LVMF) is adopted Supplementary Planning Guidance (SPG) issued by the Greater London Authority (GLA) to protect key views of Westminster World Heritage Site and St Paul's Cathedral from public spaces across the capital. The framework identifies key panoramas, river prospects and townscape views, known as designated views, where developments are required to make a positive contribution and consider their impact on foreground, middle ground and background views.

An evidence-based analysis of the setting of St Paul's Cathedral has recently been undertaken by Historic England in conjunction with the Dean and Chapter of the Cathedral. The report, which equates to steps 1 and 2 in Historic England's *Historic Environment Good Practice in Planning Advice Note 3: The Setting of Heritage Assets* (2017), assesses all aspects of its setting. The role of clear sky space is identified as central to its significance and ability to appreciate its significance both individually and in combination with others.

Previous consents

Planning permission was previously granted for the redevelopment of this site in 2020. Historic England was consulted in both 2017 and 2018. Whilst we did not provide detailed advice, we recommended that specialist conservation advice be sought from within the City of London's own planning department.

Proposals and their impact

The current proposals by David Walker Architects are for the complete demolition of the 11-storey post-war building on the site and construction a new part 14 and part 22 storey building for a mixed-use scheme that includes offices, retail and community floorspace. The proposed height of the development means that it will have an impact on the settings of more distant designated heritage assets in key views of them.

In respect of this new application, impacts on LVMF View 16B.2 The South Bank Gabriel's Wharf have been identified. The viewing platform provides views east towards the City of London and as a river prospect view, the Thames dominates the foreground. The focus of the view is St Paul's Cathedral, recognisable due to the distinctive silhouette of the dome and peristyle beside the western towers and pediment set against clear sky.

Although the proposed development would not appear in the view from the spot identified in the LVMF, it would be clearly visible as one approaches the viewing platform via the walkway east of 16B.2. It will appear behind the western pedimented parapet with statue of St Paul at its pinnacle, filling the clear sky between it and the tower to the north of the west elevation with built form. Removing the clear sky from behind this distinctive element would dilute the effect of the highly characterful



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silhouette. The visual impact of the proposals does cause harm to the Grade I listed building through development in its setting.

Policy

The 1990 Planning (Listed Buildings and Conservation Areas) Act makes it a statutory duty for a planning authority to give special regard to the desirability of preserving listed buildings or their setting (section 16 and 66) when making decisions which affect them.

Guidance on the fulfilment of statutory planning duties is set out in the government's National Planning Policy Framework 2023 (NPPF). The NPPF makes clear that when considering the impact of a scheme, any conflict with the conservation of heritage assets should be avoided or minimised (para.201). Great weight should be given to the conservation of heritage assets, and this weight should be greater for the most important assets (para.205). Clear and convincing justification should be provided for any harm caused (para.206), and any harm should be weighed against the public benefits of the scheme (para.208).

The strategic policy framework for London is set out in the London Plan. Its policy HC1(C) on heritage conservation and growth reinforces the requirement for development proposals affecting heritage assets to be sympathetic to their significance and appreciation, and to avoid harm. It justifies this by explaining the unique sense of place created by London's historic environment, and the irreplaceable nature of its heritage assets.

The London View Management Framework (LVMF) is a piece of Supplementary Planning Guidance (SPG) published by the Greater London Authority (GLA) in support of policies in the Mayor of London's 'London Plan' 2021. It is a material consideration in all planning decisions that relate to the designated views it identifies which focus on the Westminster WHS and St Paul's Cathedral.

The City of London Local Plan, adopted in 2015, includes policies which seek to protect: · the Historic environment (CS12) including policies to protect gardens and open spaces (DM12.5); · Protected Views (CS13) and only allow tall buildings in suitable locations (CS14).

Recommendation

Historic England does not object in principle to these proposals as established in our previous responses to earlier planning applications on this site.

However, Historic England considers the impact identified above would cause some



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harm, which would be less than substantial, through development within the setting of a designated heritage asset of the highest significance. A reduction in the height of the scheme would help to mitigate against this harm and we would encourage you to pursue this with the applicants as part of your wider discussions about these proposals. In accordance with the NPPF, this harm to the significance of the Grade I listed St Paul's Cathedral will need to be weighed against the public benefits of the scheme by the City of London Corporation as part of your decision-making process.

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

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

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

Yours sincerely

Breda Daly

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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

Telephone 020 7973 3700
HistoricEngland.org.uk

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Memo

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



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

Date 25 September 2024
Our Ref 24/05267/NPLN
Your Ref 24/00209/FULMAJ

Subject Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

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

There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition

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

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.

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.

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

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

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

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

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.

(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

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.

Roof terraces and balconies hereby permitted shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency.

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

No amplified or other music shall be played on the roof terraces or balconies.

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

No 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. 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.

The restaurant/cafe 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 nearby residents, adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the commercial kitchen uses. The details approved must be implemented before the individual commercial kitchen uses are implemented.

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

Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

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.

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.

Regards



Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob: 07592120750

From: Location Enquiries
Sent: Friday, September 27, 2024 5:36 PM
To: PLN - Comments
Subject: RE: Planning Application Consultation: 24/00209/FULMAJ
Importance: High

THIS IS AN EXTERNAL EMAIL

FAO Amy Williams,

Our ref 24/00209/FULMAJ

Location: Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Thank you for your consultation.

IP Engineer requires more time to review the above proposal, would it be acceptable to extend the consultation to 4th October please?

Kind regards,

Mehmet Kani | Safeguarding Engineer

LU/DLR | Infrastructure Protection | Engineering

Transport for London

7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



Please consider the environment before printing this e-mail.

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

From:

Sent: Monday, September 9, 2024 9:53 AM

To: Location Enquiries

Subject: Planning Application Consultation: 24/00209/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for Tenter House 45 Moorfields London EC2Y 9AE .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams

Environment Department

City of London

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PLNComments@cityoflondon.gov.uk

30 September 2024
Crossrail Ref: CRL-IP-3275

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

Dear Amy Williams,

24/00209/FULMAJ : Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b)) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 09 September 2024, requesting the views of TfL on the above application. I confirm that this application relates to land within the limits of land subject to consultation by the Crossrail Safeguarding Direction. If the Council, in its capacity as Local Planning Authority, is minded to grant planning permission, please apply the following conditions on the Notice of Permission:

Elizabeth line condition for foundation design and settlement

C1 None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling, any temporary works, and site investigations, have been submitted to and approved in writing by the Local Planning Authority which:-

- (i) Accommodate the Elizabeth line infrastructure, including any temporary works associated with the Elizabeth line (formerly known as Crossrail),
- (ii) Mitigate the effects on the Elizabeth line, of ground movement arising from the development. The development shall be carried out in all respects in accordance with the approved design and method statements.

All structures and works comprised within the development hereby permitted which are required by paragraphs C1(i) and C1 (ii) of this condition shall be completed, in their entirety, before any part of the building[s] hereby permitted is/are occupied.

Elizabeth line Informative - transmitted groundbourne noise & vibration

I1 The Developer is recommended to assess and mitigate the possible effects of noise and vibration arising from the operation of the Elizabeth line

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

.....

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

.....

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

From: [Location Enquiries](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 24/00209/FULMAJ
Date: 30 September 2024 17:11:34

THIS IS AN EXTERNAL EMAIL

FAO Amy Williams,

24/00209/FULMAJ

Location: Tenter House 45 Moorfields London EC2Y 9AE
Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Thank you for your consultation.

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 railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of LUL engineers that:

- our right of support is not compromised;
- the development will not have any detrimental effect on our structures either in the short or long term;
- the design must be such that the loading imposed on our structures is not increased or removed;
- we offer no right of support to the development or land.

Therefore, we request that the grant of planning permission be subject to conditions to secure the following:

a) Enabling works

No preparatory works (including removal of roof top plant enclosures; roof top plant rooms; rear conservatory; signage; main reception (including glass cladding); stone cladding panels; rear extension to loading bay; and removal of the railings to the terrace) shall take place until a detailed design and method statement (in consultation with London Underground) for such works has been submitted to and approved in writing by the local planning authority which:

- provides details on all existing structures;
- provides details on the use of tall plant / scaffolding;
- accommodates the location of the existing London Underground Structures;
- demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land to demonstrate that there will at no time be any potential security risk to our railway,

- property or structures;
- accommodates ground movement arising from the demolition thereof.

b) Phase 1 – Demolition of existing building down to slab level

No demolition (other than preparatory works covered by part (a) of this condition) shall take place until a detailed design and method statement (in consultation with London Underground) for demolition has been submitted to and approved in writing by the local planning authority which:

- provides details on all existing structures;
- provides details on the use of tall plant /scaffolding;
- accommodates the location of the existing London Underground Structures;
- demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land to demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
- accommodates ground movement arising from the demolition thereof.

c) Phase 2: Plaza Works

No works (other than demolition as per the requirements of 12a) and b) above) shall be commenced until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provides details on all proposed structures;
- provides details on the use of tall plant/scaffolding;
- accommodates the location of the existing London Underground structures;
- accommodate ground movement arising from the construction thereof; and
- mitigate the effects of noise and vibration arising from the adjoining operations within the structures.

d) Phase 3 and 4: Basement and Tenter House construction

No works (other than demolition and the Plaza Works as per the requirements of 12 a) 12 b) and 12 c) above) shall be commenced until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provides details on all proposed structures;
- provides details on the use of tall plant/scaffolding;
- accommodates the location of the existing London Underground structures;
- demonstrates access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
- demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
- accommodate ground movement arising from the construction thereof; and
- mitigate the effects of noise and vibration arising from the adjoining operations within the

structures.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Mehmet Kani | Safeguarding Engineer

LU/DLR | Infrastructure Protection | Engineering
Transport for London

7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: Monday, September 9, 2024 9:53 AM

To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Subject: Planning Application Consultation: 24/00209/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for Tenter House 45 Moorfields London EC2Y 9AE .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

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From: [Location Enquiries](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 24/00209/FULMAJ
Date: 30 September 2024 17:26:24

THIS IS AN EXTERNAL EMAIL

FAO Amy Williams,

Please find amended response with our recommendations numbered per phase

24/00209/FULMAJ

Location: Tenter House 45 Moorfields London EC2Y 9AE
Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Thank you for your consultation.

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 railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of LUL engineers that:

- our right of support is not compromised;
- the development will not have any detrimental effect on our structures either in the short or long term;
- the design must be such that the loading imposed on our structures is not increased or removed;
- we offer no right of support to the development or land.

Therefore, we request that the grant of planning permission be subject to conditions to secure the following:

a) Enabling works

No preparatory works (including removal of roof top plant enclosures; roof top plant rooms; rear conservatory; signage; main reception (including glass cladding); stone cladding panels; rear extension to loading bay; and removal of the railings to the terrace) shall take place until a detailed design and method statement (in consultation with London Underground) for such works has been submitted to and approved in writing by the local planning authority which:

1. provides details on all existing structures;
2. provides details on the use of tall plant / scaffolding;
3. accommodates the location of the existing London Underground Structures;
4. demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land to

- demonstrate that there will at no time be any potential security risk to our railway, property or structures;
5. accommodates ground movement arising from the demolition thereof.

b) Phase 1 – Demolition of existing building down to slab level

No demolition (other than preparatory works covered by part (a) of this condition) shall take place until a detailed design and method statement (in consultation with London Underground) for demolition has been submitted to and approved in writing by the local planning authority which:

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2. provides details on the use of tall plant /scaffolding;
3. accommodates the location of the existing London Underground Structures;
4. demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land to demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
5. accommodates ground movement arising from the demolition thereof.

c) Phase 2: Plaza Works

No works (other than demolition as per the requirements of 12a) and b) above) shall be commenced until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

1. provides details on all proposed structures;
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4. accommodate ground movement arising from the construction thereof; and
5. mitigate the effects of noise and vibration arising from the adjoining operations within the structures.

d) Phase 3 and 4: Basement and Tenter House construction

No works (other than demolition and the Plaza Works as per the requirements of 12 a) 12 b) and 12 c) above) shall be commenced until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

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3. accommodates the location of the existing London Underground structures;
4. demonstrates access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
5. demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
6. accommodate ground movement arising from the construction thereof; and

7. mitigate the effects of noise and vibration arising from the adjoining operations within the structures.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Mehmet Kani | Safeguarding Engineer

LU/DLR | Infrastructure Protection | Engineering
Transport for London

7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



Please consider the environment before printing this e-mail.

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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: Monday, September 9, 2024 9:53 AM

To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Subject: Planning Application Consultation: 24/00209/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for Tenter House 45 Moorfields London EC2Y 9AE .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

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Corporation of London Department of Planning & Transportation Our DTS Ref: 75854 Your Ref:
PO Box 270 Guildhall London EC2P 2EJ 24/00209/FULMAJ
1 October 2024

Dear Sir/Madam

Re: TENTER HOUSE , 45 MOORFIELDS, LONDON, -, EC2Y 9AW

Waste Comments

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

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe 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 and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit

from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Water Comments

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

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme

for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe 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 and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

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

Thames Water are currently working with the developer of application 24/00209/FULMAJ to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve the first 19,000sqm of office space at 1.5l/s but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the first 19,00sqm of office space at 1.5l/s until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3
9SQ Tel:020 3577 9998 Email: devcon.team@thameswater.co.uk



From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Planning application 24/00209/FULMAJ - Objection to the scheme amendments for Tenter House, 45 Moorfields, EC2Y 9AE
Date: 03 October 2024 09:27:55

Some people who received this message don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

Dear Ms Williams,

[Planning application 24/00209/FULMAJ - Objection to the scheme amendments for Tenter House, 45 Moorfields, EC2Y 9AE](#)

The Barbican and Golden Lane Neighbourhood Forum objects to this development on the boundary of our Neighbourhood Area, which adversely affects the setting of the Listed Barbican Estate and damages the amenity for residents within our Area.

Application 24/00209/FULMAJ, as recently revised, seeks to increase the height of Tenter House to 21 storeys [+95.25m AOD]. This is three storeys higher than the previous consent (the 2020 scheme) resulting in a “tall building” which City of London emerging planning policy (City Plan 2040), and the Mayor of London, recognise as unsuitable for this location as it is not a cluster.

There is no suitable mitigation to the damage to the views of St Paul’s Cathedral, which are being progressively compromised by one small-scale encroachment after another.

The building is still too high and the Forum sees no justification for going beyond the 18 storeys approved previously on this site.

As the servicing yard is not big enough for vehicles to turn around there will also be noisy reversing, breaching the City’s current plan policy DM 16.5. Tenter House is next to people's homes and bedrooms, where noise is an issue. It is on a strategic cycle route and is a potential "quiet street" in the Barbican, Bunhill and Golden Lane Healthy Neighbourhood programme. For these reasons, servicing should comply with the Local Plan and be done entirely within the building with a turning circle large enough to allow vans to enter and exit in a forward direction.

To safeguard amenity under the Local Plan (DM15.7, DM21.3), terraces overlooking should be limited by condition to restrict use after 6pm on weekdays, and none at all on weekends and Bank Holidays, as with the London Wall West application which said (condition 41) that: “The roof terraces hereby permitted shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency”.

To protect from intrusive light at night, and to comply with the City’s Lighting SPD, window units with integral blinds should be required as a condition.

Finally, the Forum also objects to the treatment of Whole Life Carbon. The demolition currently underway under a previous application and this application are clearly one scheme. Guidance on WLCA allows them to be treated as such and we do not understand why the City would choose to undermine its own Retrofit First policy by failing to do so.

Please note that the Forum was not consulted on the revisions to this application during design evolution and before they were submitted to planning.

Yours sincerely,

Brenda Szlesinger and Peter Jenkinson,
BGLNF Co-Chairs

Memo

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



From Mrs Claire Callan-Day
Environmental Health Technician
Environment Department

Telephone [REDACTED]

Email [REDACTED]

Date 04 October 2024

Our Ref: 24/05267/NPLN

Your Ref: 24/00209/FULMAJ

Subject: Tenter House 45 Moorfields London EC2Y 9AE

RE: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

I wish to make the following comment in an amendment to the comments provided on 25 September 2024, by my colleague Donal Rooney:

Balconies that are solely located on the eastern façade (Moorfields elevation), and have no access to any other facade, hereby permitted shall not be used or accessed between the hours of 2100 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency. All other roof terraces and balconies shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, 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.

Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.

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

Regards



**Claire Callan-Day Environmental
Health Technician** Environment
Department
City of London Corporation 




Representing the interests of Barbican Residents

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

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

6th October 2024

For the attention of Ms Amy Williams, Senior Planning Officer

Dear Ms Williams

Ref: Planning reference number: 24/00209/FULMAJ; Tenter House 45 Moorfields London EC2Y 9AE

We are writing on behalf of the Barbican Association, a Recognized Tenants' Association representing the 4000+ residents of the Barbican Estate, to **object** to the revised application for the "*Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA]*".

Our objections to this application remain focused both on the impact of the proposals on the significant loss of residential amenity that this development would cause, its impact on the setting of the Grade II and II* listed Barbican Estate and on the seemingly blatant disregard of the developers to adhere to City planning policies.

We would therefore highlight:

- Lack of consultation on revised plans
- Increase in height remains unacceptable
- Increase in mass remains unacceptable
- Loss of Daylight & Sunlight and Overshadowing remain unacceptable
- Spurious argument re balconies remains unacceptable
- Design and bulk out of keeping with surrounding townscape
- Cumulative impact of recent developments ignored
- Light pollution remains a worrying issue
- Concerns re noise pollution from terraces unassuaged

- Unacceptable access, entry and servicing routes
- Unclear strategy regarding waste
- Whole Life Carbon Assessment ignores emissions from demolition

Taking each in turn:

1. Lack of consultation on revised plans

It is disappointing that notice of this re-consultation was only made available to those who had made representations to the earlier planning application and not to the wider community affected by these proposals. Despite the fact that around 100 new documents had been loaded on to the planning portal in September 2024, no direct contact was made by the applicant to neighbouring stakeholders to make them aware of and discuss the changes that had been made to the plans - nor was notice of this re-consultation published on the widely distributed weekly planning lists sent out by the City of London Corporation.

The so-called Statement of Community Involvement – Addendum, dated August 2024 and which was loaded on to the Planning portal on 6th September 2024, remains focused on the consultation process undertaken **prior** to the submission of the planning application in February 2024 and not to the current revised proposals. The document states (erroneously, in our view) on the subject of “Engagement with Barbican residents” that *“At the time of writing, a meeting is being arranged with Barbican Estate residents to brief them on the design changes, which is due to take place in early September”*. On speaking to a number of residents and House Group Chairs, it is our understanding that no such meeting has ever taken place. Why not?

This lack of communication and consultation with stakeholders surely does not comply with the City of London’s recent Statement of Community Involvement, dated July 2024, which stresses that developers should not only *...enter into meaningful engagement with local communities and key stakeholders in a positive and timely fashion ...*” but should also ensure that *“...stakeholders will be provided with all the information they need **when they are consulted** so that they can offer informed views. This includes the consultation aims, methods to be used and the timetable for responding...”*

In this case, stakeholders were most definitely “not provided with all the information they need when they are consulted” as no re-consultation ever took place. It is clear, therefore, that the applicant has not complied with the City’s own obligations.

It is also our understanding that this revised application is to be determined at the next Planning Applications Sub-Committee which is to be held on 29th October 2024. It is therefore hard to believe that the Planning Officer’s recommendation will be anything other than positive, thus rendering this re-consultation not only meaningless and ineffective but also carried out as a mere box-ticking exercise.

2. Increase in height remains unacceptable

Whilst we welcome the small reduction, we maintain our view that the building is still too high. The previous planning application, which was validated on 26th March 2024, proposed a new part 14-storey and part 22-storey building, rising to a height of 99.9m AOD. This revised application is for a part 14-storey and part 21-storey building rising to a height of 95.25m – a reduction in height of just 4.66m or 5%.

We would make the observation however that the current Tenter House is just 11 storeys high with a height of 74.9m and that the previously consented scheme (planning reference number: 17/01050/FULMAJ) was for a building of 18-storeys giving a height of 87.9m AOD. The proposed height

in this revised application, whilst slightly reduced from the earlier application validated in March 2024, is therefore 7.45m higher than that proposed in the previously consented scheme – and over 20m higher than the existing building.

It will therefore still be considered and assessed as a tall building in accordance with the City of London's definition. We would remind you that both the Mayor of London and the emerging City Plan 2040 state that this location is not a suitable one for tall buildings (definition over 75m AOD) and we are concerned that granting approval to this scheme in its present form will set a precedent for similar unsuitable applications, thereby riding a coach and horses through this important London policy by simply ignoring it. The current version of the 2040 plan confined tall buildings of over 75m AOD to two specific areas – the Eastern Cluster and near Fleet Street – precisely because the London Mayor found the previous draft of the City Plan, which enabled tall buildings more or less anywhere in the City, non-compliant with the London Plan.

It is also of concern that the reduction in height was driven by its impact on the views of St Paul's Cathedral rather than the adverse impact on the many residents in the adjacent location. The Replacement Townscape, Heritage and Visual Impact (THVIR) document states that *"The Proposed Development assessed in this Report takes into account amendments to the design made since the application was submitted – most notably the reduction in the maximum height of the proposals by 4.66m together with changes to the detailed design of the building top. **These design changes were made in consultation with and agreed by City of London (CoL) Officers** following a review by the Applicant in light of concerns raised by the CoL as to the extent of visibility of part of the top of the Proposed Development beyond St. Paul's Cathedral in albeit limited views from the South Bank when moving east from LVMF Viewing Location 16B.*

We would observe, however, that the increased mass still interferes with views of St Paul's, albeit to a more limited extent. We also have to say that it is disappointing to note not only that distant views have driven the reduction in height rather than the impact on the peoples' lives but also that these changes have already been agreed by the CoL officers. This calls into question yet again the purpose of this so-called re-consultation as it appears that an approval decision has already been agreed.

We would also like to comment at this stage that we find the current practice of specifying height by AOD rather than "real" levels as unhelpful and unrealistic. As people walk around the streets of the City and see a tall building and wonder how high it is, they are unlikely to ask "how high is this area above sea level" before determining the outcome. People need to know the height of the building in front of them in absolute terms, not just on AOD terms. We therefore suggest that both measurements be included in applications to enable everyone to understand the height of proposed applications in real terms.

3. Increase in mass remains unacceptable

Turning now to the mass of the proposed building, the previous planning application (validated on 26th March 2024) proposed office floorspace of 34880sqm and 2 retail spaces totalling 556sqm. This revised application proposes office floorspace of 33758sqm (a reduction of a mere 3%) and 1 retail space of 287sqm (a reduction of 48%). Again, we would note that the office floorspace in the current Tenter House totals 15465sqm scheme – hence the **revised proposal will still provide more than double the office floorspace of the existing.**

It is also 23% more than the previously consented scheme which was for office floorspace of 27443sqm. The applicant's previous claim that *"The overall height and scale of the Proposed Development is consequently broadly the same as the Permitted 2020 Scheme"* is therefore clearly

wrong. The design is also wider at the top than the previously consented scheme, which again will have a more detrimental impact on residential amenity and the wider townscape.

4. Significant Loss of Daylight and Sunlight and Overshadowing remain unacceptable

We voiced our concerns over this matter in our May 2024 objection letter and, given the very slight reductions in height and mass that are now proposed, they remain unassuaged. We continue to contest the applicant's view that the extra height of the proposed building will have no effect on residents in the near vicinity – in particular those in Willoughby House. A 20m + increase in the height of the building (and some 7 metres higher than the previously consented scheme) will inevitably have an adverse impact on the level of daylight and sunlight received by neighbouring properties as will the potential for overshadowing. Whilst the major impact will indeed be felt by residents in Willoughby House, the additional height will also block daylight and sunlight to all of the west facing residential blocks in the Barbican in the vicinity of Moor Lane including Gilbert House and Speed House.

Neighbours, in particular those in Willoughby House which is a mere 70 metres from the site, were not shown or informed of the impact that the revised proposals would have on the levels of daylight and sunlight that they could expect. The detrimental impact of the increase in height of the scheme remains, however, significant. Indeed, not only does the data provided in the Daylight Sunlight and Overlooking Report – Addendum show a substantial reduction in both NSL and VSC vs the 2020 permitted scheme but it also shows that the detrimental impact on some rooms is even greater than the earlier application made in February 2024 due, we must assume, to the increased mass at the top of the proposed building.

The data provided clearly does not support the applicant's claim of *'whilst the Proposed Development will give rise to some minor reductions in daylight and sunlight to Willoughby House these reductions are considered to be so minor as to be unnoticeable'*. We would counter this claim and remind the City of its own planning policies, in particular Policy HS3, which states that *"All development proposals should be designed to minimise overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation"*. The policy regarding Residential Environment in the emerging City Plan 2040 (Policy HS3) repeats and reinforces this *"All development proposals should be designed to minimise overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation. Light spill from development that could affect residential areas should be minimised, in line with policy DE8..."*

This application clearly breaches this requirement and it is disappointing in the extreme to note that City yet again chooses to ignore its own planning policies to the detriment of residents.

5. Spurious argument re balconies remains unacceptable

The applicant's claim that the reductions in daylight and sunlight *"are considered to be so minor to be unnoticeable"* are spurious, not least as the report goes on to admit that *"there are some transgressions from the BRE Guidelines seen for daylight and sunlight within Willoughby House...."*

However, the applicant does not blame this on the significant increase in height and mass of the proposed building situated just 70 meters away from this densely populated residential area but instead blames *"these transgressions are almost entirely due to the presence of the overhanging balcony...."*

We would question yet again how balconies (actually important and vital fire escapes) on part of a Grade II listed building, which was completed in 1971 and is sited in a significant and historic

Conservation Area, can be at fault for the substantial loss of light caused by the planned increase in height of this proposed building located less than 100 meters away from the Barbican Estate on the opposite side of Moor Lane?

We would remind that this subject is referred to in the current Local Plan section 3.10.41 which states “The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments.....When considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals. Where appropriate, ***the City Corporation will take into account unusual existing circumstances, such as development on an open or low rise site and the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive.***” We would therefore suggest that City Corporation takes heed and follows its own guidelines on this subject by applying them to this application.

The Barbican Association has long argued that allowing developers to reduce daylight to residences using the existence of balconies as an excuse does real harm to residential amenity. The point about daylight and sunlight is that residences need a decent amount of daylight and sunlight and it shouldn't be reduced below reasonable levels simply because of technicalities in the guidelines: the reductions to the occupants are real. Moreover, it is not unreasonable for residential flats to have balconies: they provide residential amenity.

To the old legal adage that “you take your victims as you find them” – which means that particular oddities/frailties of an injured party (in this case residents with balconies) cannot be used as a defence to limit the liability of the at-fault party (in this case the developer of a much larger building), we would add the “Agent of Change Principle”. This, which features prominently in the National Planning Policy Framework and the London Plan, requires that new nuisance-generating development proposed close to residential areas should put in place measures to mitigate and manage the nuisance. In the case of a loss of daylight, which cannot be mitigated, the increase in height that leads to the loss of daylight should be refused. Although this principle is often thought of in the context of noise nuisance it applies also to other nuisances such as loss of daylight, light pollution, and construction noise, and deliveries (see below).

6. Design and bulk out of keeping with surrounding landscape

As we stated in our previous objection letter in May 2024, preceding replacement buildings along Moor Lane, from Ropemaker Street to Fore Street, have largely respected the shoulder height of the opposite Barbican buildings, with any additional building mass developed towards Moorfields and away from the residential estate. On the one hand this created a consistent building height along the street and on the other it mitigated the buildings' impact on residential amenities.

This proposed development makes no attempt to do that, making it not only out of keeping with the surrounding townscape but also damaging the setting of the listed Barbican Estate and Conservation Area. We therefore take issue with the applicant's claim that “*The Proposed Development would be seen and understood within an established urban setting of large scale modern commercial development to the east of the Estate..... and would not affect the character and appearance of the conservation area overall....*”

7. Cumulative effect of recent developments ignored

Both the current Local Plan and the emerging City Plan 2040 state that “*The cumulative impact of planning applications for individual developments on the amenity of existing residents will be considered.*” There have been a number of significant new developments around the Moor Lane area

over the past few years – including the Heron Building, 22 Ropemaker Street, City Point, 21 Moorfields, WeWork, London Wall Place. These have all had a detrimental impact on the residential amenity of the neighbouring properties but this has been – erroneously in our view – consistently ignored by the City Planning Officers.

We urge the planning committee to take into account the cumulative effects of these developments in tandem with the increased height and mass proposed in this current application regarding Tenter House. We also urge the committee to pay particular regard to its policies on protecting residential amenity next to the City’s largest residential cluster (DM21.3 in City Plan 2015 and Policy HS3.2. and HSE.3 in the emerging Plan 2040) .

8. Light pollution remains a worrying issue

Referring to the current Local Plan section 3.10.41, you will be aware that it states: ***“When considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals”***. We have already mentioned that the proposed increase in height and mass of the new Tenter House also gives rise to serious concerns over light pollution. Policy HL3 of the current City Plan Noise and light pollution states that ***“Developers must consider the noise and lighting impacts of their development..... 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..... New development must include suitable mitigation measures such as attenuation of noise or light spillage or restrictions on operating hours.....”***

Policy D9 of the London Plan with regard to Tall Buildings also re-confirms this....” ***buildings should not cause adverse reflected glare.....buildings should be designed to minimise light pollution from internal and external lighting....”***

Light pollution at night is unacceptable and is a significant issue for residents. We would therefore recommend a **strict and enforceable planning condition to be attached to any consent** to this application for the compulsory fitting of integral blackout blinds to the west facing windows to drop automatically at, say 7pm, to prevent the high level of light pollution adversely impacting the many residential homes opposite the site. We would also request the independently verified commissioning of automated sensor systems to turn lights off after a certain time. In addition, we seek that the contractors fit black Corex sheeting while fit out is taking place to ensure no light spillage into residential areas. The application of these conditions would be in line with and support the recommendations in the City of London’s own Lighting SPD, which was adopted in October 2023. And they would be in line with the Agent of Change principle – that the new development should mitigate the impact of nuisance (in this case light pollution) on existing residents

9. Concerns re noise pollution from terraces unassuaged

It is also disappointing to note that no substantive changes have been made to the size and location of the terraces. We commented in our previous objection letter that we trusted “that the Planning Officers are aware that the bedrooms of the 145 flats in Willoughby House face Moor Lane”. The lack of any substantive change to the applicant’s plans suggests that this is sadly not the case. The issues of noise pollution and the use of terraces and viewing galleries are covered by both the London and current City plans

Policy D14 of the **London Plan** states that noise should be managed by *'avoiding significant adverse noise impacts on health and quality of life'*. Policy DE5 of the current City Plan states that ***"Roof terraces will be encouraged where..... There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity....."***

The potential for noise pollution in a location close to such a densely populated residential area is substantial and has the potential to have a significant adverse impact on residential amenity – in direct contravention to both the London and City Plans. As has been the case in all of the previous development applications submitted in the vicinity in the area, **we request the setting of strict and enforceable conditions at this planning stage as to the use and timing of the proposed terraces and "woodland". Terraces should be closed at 6pm on weekdays and at all times at weekends and Bank Holidays ..other than in the case of emergency (in this we have followed the recommendations of the environmental health team made in relation to the London Wall West scheme).**

10. Unacceptable access, entry and servicing routes

The applicant's plans show a more than doubling of the mass of the building which will inevitably increase the number of deliveries to and for the servicing of the site. It is surely therefore the applicant's responsibility to change the internal design to accommodate this substantive increase in a manner which is compliant with City policy.

City policy dictates that vehicles should be able to turn inside a service yard in order to be able to drive out frontwards – and not have to reverse. **The applicant should be reminded of this basic requirement.** Indeed, we recall that the service yard for the 21 Moorfields development was moved from Fore Street Avenue to Moor Lane so that all vehicles could drive in, turn and drive out in forward gear and would suggest that this applicant does likewise.

Frustratingly, the applicant openly admits that the servicing yard is too small for lorries to turn round in which means that they will have to reverse into the yard. Reversing beepers from these HGVs will therefore create a serious noise nuisance in such a densely populated residential area and it remains worrying that white noise beepers are still not mandatory in such areas of the City.

The Transport Assessment Addendum confirms that there have been no substantive changes to the Delivery and Service Plan (DSP). It suggests that the prior submitted proposals would generate a demand for 80 deliveries per day for the office use and 7-8 deliveries per day for the retail/commercial use, a total of 88 deliveries per day – whereas this revised application would give rise to a mere 82 deliveries per day. Nevertheless, when this total is added to the 100+ deliveries every day to City Point, it is clear that Moor Lane is unlikely to be the quiet, greened street that was originally promised.

The applicant then tries to minimise the adverse impact of its inadequately sized servicing yard by claiming that *"the proposal is for vehicles to reverse into the service yard and exit in forward gear* and that *"The service yard has been designed to accommodate vehicles up to and including a 10m rigid lorry, albeit most vehicles will be smaller than this..."* i.e. they will be small enough to turn in the area. The Assessment Addendum then seeks to reassure further *"that deliveries will be consolidated at the Site, with the potential for 50% of deliveries to be consolidated, which would reduce servicing demand to around 41 deliveries per day.*

Nevertheless, **the analysis demonstrates that the development in its worst-case scenario of 82 deliveries per day, would generate up to 10 HGVs per day, with the remainder (72 deliveries) being**

by smaller vehicles of motorcycles, cars and vans, which have substantially lower impact on the environment and the local highway network and neighbouring residential amenity. However, in “the consolidated scenario... the 41 deliveries per day would **generate up to 5 HGVs per day**, with the remainder (36 deliveries) being by LGVs including motorcycles which most definitely would have an impact on the environment, the local highway network and neighbouring residential amenity.

The Addendum goes on *“it is expected that the vast majority of vehicles will be small to medium sized (such as motorcycles, cars or vans) which are generally not equipped with the audible warnings or reverse beeps which can affect amenity. Whilst **HGVs are more likely to emit audible warnings**, they service the development much less frequently...”*

The Applicant seeks to reassure by stating that they are *“willing to limit servicing hours as reasonably recommended by the CoL to minimise any potential impact on amenity and the local highway network. As per the consented development, deliveries would be undertaken at off-peak times”* but without stating what constitutes off-peak times.....perhaps deliberately as off-peak hours are typically pre 7am and post 9pm – which would clearly have a significantly adverse impact on residential amenity.

We would remind that City Policy HS3 states that *“The amenity of existing residents will be protected by resisting uses that would cause unacceptable disturbance **from noise, fumes and smells and vehicle or pedestrian movements**. 1. New 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 within the new development and, where required, planning conditions will be imposed to protect residential amenity...”*

It is therefore patently clear that **the access route to the service yard should be from and to Moorfields rather than Moor Lane.**

We recall that the CoL insisted on a servicing yard big enough for lorries to turn around in when approving the 2020 scheme. The same requirement should surely also be applied to this application.

The significant increase in traffic will also be a danger for the many users of the strategic cycleway along Moor Lane. As well as creating excessive noise, the plans as they currently stand are both unsafe and unworkable and will create significant noise and disruption in the area. The applicant has also clearly overlooked the fact that Moor Lane is to form part of the Healthy Neighbourhood Scheme.

Bunhill, Barbican and Golden Lane Healthy Neighbourhood Consultation

We would remind that the City is about to publish a consultation on a healthy neighbourhood for the Bunhill, Barbican and Golden Lane area. This would include Moor Lane (which is already a designated quiet road for cycling) and may end up with restrictions on the use of this street.

You may recall that the results of the preliminary neighbourhood engagement consultation was reported to the 4 July 2024 meeting of the Streets and Walkways Sub-Committee. With specific reference to Moor Lane, concerns included traffic volumes, vehicle speeds, vehicle parking, air quality, noise pollution, and cycle and pedestrian access and safety. Suggestions were therefore made to introduce, inter alia, vehicle restrictions, traffic calming and enforcement measures and measures to reduce noise pollution, including restricting access to loud vehicles.

Has the applicant been made aware of this consultation? We question this as the service and delivery proposals put forward in this application most certainly do not conform to the recommendations being made, particularly in terms of traffic volumes and noise. Joined up thinking would anticipate this by requiring all service vehicles to enter and leave via Moorfields

11. Unclear strategy regarding Waste

We continue to feel that the waste strategy remains unclear and contradictory. We continue to object to the plan that waste is to be stored adjacent to but not within the servicing yard given that this creates the very real potential for significant noise pollution given that the noise of throwing waste into bins – particularly solid items – can carry a long way. The storage and handling of waste should be made within the building.

12. Whole Life Carbon Assessment ignores the emissions from demolition

We would also reiterate the point made in our previous objection letter – that is that the WLCA excludes the carbon associated with the current building's demolition. The WLCA submitted by the applicant completely ignored the carbon emissions associated with the demolition of the existing building as this had been granted under a previously granted planning consent. This - somewhat disingenuously – is clearly seeking to evade the City's "retrofit first" policy and completely ignores a very large amount of embedded carbon from its calculations.

The London Plan (and indeed the emerging City Plan 2040) makes it clear that this assessment should ***"take into account any carbon emissions associated with pre-construction demolition"***. This application rides a coach and horses through this formal planning guidance and it is disappointing that the City of London has chosen to ignore it through a technicality – not least given its much publicised and focus on and dedication to reducing carbon emissions.

Summary

The revisions made to this application are minimal and will continue to have an unacceptable impact on residential amenity and the surrounding townscape. By claiming that there is very little carbon embedded in this new scheme as the current Tenter House is already in the process of being demolished under an old planning consent, the City's "retrofit first" policy is being sidestepped in a most climate-unfriendly way.

This proposed 21 storey tower is surrounded not just by several important Conservation Areas but also hundreds of peoples' homes and is therefore unsuitable for such a tall, bulky new build. It pushes up over the historic skyline. It cuts out daylight and sunlight for people who live next door, and who will also be overlooked by roof terraces. 82 deliveries are projected to arrive every day, including weekends, along a narrow residential street and strategic cycle route, with HGVs being forced to reverse into the servicing yard given the inadequate space provisions made. This will create unacceptable levels of noise and traffic and is a danger to residents, pedestrians and cyclists alike. Many of the proposals run counter to City policies.

For all of the many reasons expanded on in this representation we would therefore request that this application be refused in its current form.

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-Committee

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

Amy Williams
Development Division
Corporation of the City of London
Sent via email only

8th October 2024

Dear Amy,

**Planning Application Follow Up Response Letter, Tenter House (ref:
24/00209/FULMAJ)**

Introduction

I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the proposed redevelopment of Tenter House.

This letter has been prepared following review of the planning application material uploaded to the planning portal. It follows and should be read with a previous letter prepared following consultation with the applicant, which is included appended to this response.

As a related matter, we noted in the previous letter that we had not been consulted on this project. We note that the Planning Team advise that consultation notices had been issued to St Paul's: we have searched our records and cannot find this notification. Outside of discussions on Tenter House, we can follow up with the City on this matter to see if we can identify what has happened.

Discussion

A review of the submission material has not prompted any change in our view on the scheme, as outlined in the previous letter. We raise an **objection** to the enlarged and higher scheme and consider it should be refused.

The enlarged proposals will appear directly behind and impact the silhouette of the west front pediment in nearby views along the south bank of the Thames (east of Gabriel's Wharf).

As appreciable from this part of the setting of the cathedral, the proposals will cause heritage harm to the significance of the Grade I listed building, affecting its architectural and historic special interest. This impact occurs to one of the most important and sensitive part of Wren's composition of this building, which is of exceptional heritage significance and sensitivity.

We also consider this would run contrary to the guidance related to the backdrop and skyline setting of the Cathedral outlined within the City's Protected Views SPD.

We understand that the proposals build on an extant consent. However, the additional height included within the submission scheme would lead to harm not previously present. It is our understanding that the extant consent is not appreciable in these views. The new scheme adds height where harm is appreciable and, in our view, can and should be avoided – not mitigated.

We have also reviewed the submission pack, and to our knowledge cannot find any meaningful discussion of a 'no harm' option in the justification. In our view the 'no harm' option is exemplified by the existing consent - which shows that there must be a viable and architecturally acceptable no-harm (not visible) scheme which, by dint of the approval granted, has been deemed compliant with policy.

We welcome the technical work that has indicated with care and precision how the proposal is visible in views. We also recognise the design efforts made to reduce and mitigate harm by thoughtful consideration of detail and materials thus far, as outlined within the submission pack and within our consultation meeting.

However, the lack of a 'no impact' option within the formal pack of submission materials is of concern and, to our understanding, does not satisfy the need to clearly and convincingly justify harm as outlined within the NPPF.

We understand that there may be, as in many such cases, a viability justification for the proposals. We also understand that the proposal may deliver public benefit. However, this would come at the cost of heritage harm to an important aspect of a Grade I listed building of exceptional significance, in the context of repeated erosions of the contribution of the setting of the Cathedral to date.

As we note above, there clearly is a viable 'no-harm' solution, which would be to either build out or modify the current consented scheme to optimise the development opportunity, without there being any visibility in this most sensitive of contexts.

We therefore hope for meaningful change in the proposals to avoid this heritage harm.

Yours sincerely,



Surveyor to the Fabric

Encl: Letter dated 13th September

cc: Rebecca Thompson: Director of Property, St Paul's Cathedral
Tom Nancollas: Assistant Director (Design), City of London

Directors:

Oliver Caroe RIBA AABC
Mark Hammond RIAS RIBA AABC

Associates and Designers:

Touseer Ahmad RIBA AABC CEPH
Matthew Cox RIBA CA MAPM
Andrew Senior ARP



Surveyor to the Fabric

Caroe Architecture Ltd. is a company limited by guarantee, registered in England & Wales: registered number 06927269; Lewis House, Great Chesterford, Essex CB10 1PF

Amy Williams (& Tenter House Project Team)
City of London
Sent via email only

13 September 2024

Dear Amy Williams (& Members of the Tenter House Project Team),

**Letter in Response to Planning Application: Tenter House (ref:
24/00209/FULMAJ)**

Introduction

Further to a meeting of 20th August, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the evolving proposals for Tenter House.

Background to Response

We welcome dialogue with the project team. We also seek to acknowledge their approach to consultation, openness to discussion, and the high quality of the material issued to us to assist us understanding the scheme.

We note that additional material may have been very recently uploaded to the planning portal. This letter of response has been prepared in response to material received as part of direct discussions with the project team only – the need for a timely response has meant that any additional information has not yet been reviewed. Further comment may follow following review of the additional information submitted.

As we understand it, this application was not notified to St Paul's because the visual impacts were not identified. The very need for dialogue highlights issues within the planning process with regards to discovery, disclosure and acknowledgment of potential impacts to the Cathedral (and indeed other heritage assets). It is regretted (by all concerned) that impacts to the Cathedral were not identified by the City or applicant team ahead of this time, whilst the application was already in process.

Whilst the scheme may not be appreciable in any strategic views (of relevance is 16B.1 and 2 at Gabriel's Wharf) assessment by the project team has shown that the proposals would be visible behind the highly significant west front of the Cathedral from areas just beyond this viewpoint.

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It is now clear and confirmed by the project design team that the proposals would have adverse visual impact to locally identified views. In our view, even the revised (lowered) proposals will cause heritage harm (see below).

We have concerns that this was not picked up during the development of the scheme, or during the early submission process. Despite being advised that 'the context has changed' since the submission of the extant consent in 2020, there have been no fundamental shifts in policy or guidance since this time. While technology has improved, we would argue this makes it more likely that potential impacts would be identified.

Our discussion of the impact of the proposals is provided below. Please note, we have provided this initial letter based upon information presented to us to date. We understand further information and heritage and visual assessment is being provided. However, given our concerns it was considered a prompt initial response would be beneficial.

Planning Policy Context

A number of key policies are relevant to this proposal in relation to the Cathedral. These are drawn from the adopted City of London Local Plan 2015, the London Plan 2021, and the National Planning Policy Framework. We have also given consideration as to the emerging draft City Plan 2040 (previously City Plan 2036). Whilst a broad range of policies are relevant, particular consideration is given to those concerning protection of the historic environment and tall buildings.

The key policies relevant to the impact of the emerging proposals on the Cathedral are summarised below:

City of London Local Plan 2015:

- Core Strategic Policy CS10: Design
- Policy DM 10.1 New Development
- Policy DM 10.4 Environmental Enhancement
- Core Strategic Policy CS12: Historic Environment
- Policy DM 12.1 Managing change affecting all heritage assets and spaces
- Core Strategic Policy CS13 Protected Views
- Core Strategic Policy CS14 Tall Buildings

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One of the particular points of emphasis within the Emerging City Plan 2040 – and as directed by the GLA – is the correct and suitable placement of tall buildings. The spirit and detail of these emerging policies therefore has some relevance for this application.

The London Plan 2021:

Policy D1: London’s Form, character and capacity for growth

Policy D4: Delivering Good Design

Policy D9: Tall Buildings

Policy HC1: Heritage Conservation and Growth

Policy HC3: Strategic and Local Views

Policy HC4: London View Management Framework

National Planning Policy Framework:

Chapter 12: Achieving well designed places

Chapter 16: Conserving and enhancing the historic environment

Comment on the Proposals

We have concerns regarding the visual and heritage impact of the proposals as appreciable from Bankside, near to Gabriel’s Wharf. As we read the situation and the impacts, even the reduced height scheme will impact and be visible in the background of the most significant features of one of the most sensitive and exceptionally significant buildings in London.

The proposals do not lie within the St Paul’s Heights Policy Area but would be appreciable in the backdrop of the Cathedral. As such, the ‘backdrop and skyline setting of the Cathedral’ section of the City’s Protected Views SPD is relevant. This states that, ‘From other Heights viewpoints where no tall buildings appear in the backdrop and the Cathedral is seen against clear sky, new development should maintain this situation.’

Currently, the silhouette of the west front pediment between the west towers, including the statue of St Paul atop, is visible against open sky in parts of this kinetic sequence. The proposals would appear behind the pediment, eroding this silhouette. Whilst we appreciate that real and material design efforts have been made since submission to minimise this erosion (through lowering the height of the building twice) we consider that

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the proposals would still run contrary to the guidance within the SPD and cause adverse visual impact and be contrary to Core Strategic Policy CS14: Tall Buildings (of the adopted Local Plan 2015) which states ‘Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features.’

This adverse visual impact would cause heritage harm. From this location, the clear sky setting around the pediment is indicative of the way in which the Cathedral was intended to be viewed. These views allow for an appreciation of the architectural interest of the Cathedral through the legibility of its key forms. Views also allow for an understanding of the historic interest of the Cathedral, the remaining clear skyspace allows for an understanding of the historic pre-eminence of St Paul’s in London.

In addition, the pediment is a focal point of the west front, the ‘principal elevation’ of the building architecturally, symbolically, and historically. It is important to how the Cathedral is identified and its significance appreciated from its setting, especially where it is visible with only clear sky beyond, increasing its legibility and the ability to appreciate this significance.

While we appreciate these this sky setting is already comprised in parts of this kinetic sequence, and that efforts have been made to minimise the extent of skyspace eroded, the proposals would still cause harm to a Grade I listed building of exceptional heritage value. As noted within the NPPF, when considering impacts ‘great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)’.

We also understand that the proposals build upon an extant consent. However, the project team have confirmed that the consented scheme would not be visible from the viewpoints noted above. As such, when compared to the consented baseline or the current situation, the proposals would cause impact to the Cathedral. We submit that this impact is clearly avoidable and should not, in our view, be consented.

Therefore as proposed, the scheme would not be concordant with planning policy and we suggest that proposals should either be amended or refused approval.

Conclusion & Next Steps

We again thank the project team for their frank and constructive dialogue to date, though wish that the need for this dialogue had been avoided.

We await the detailed heritage assessment of heritage significance and impact currently being prepared by the project team. We would also be open to further dialogue with the team, including Officers from the City.

As part of future discussion, we would hope to see a meaningful reduction in the height of the building, and exploration of a 'no-harm' option to understand why this has not been achieved.

We hope this a response that furthers the shared aspirations of the City and Cathedral.

Yours sincerely,



Surveyor to the Fabric

cc: Tom Nancollas, Deputy Director (Design), City of London
Rebecca Thompson, Director of Property, St Paul's Cathedral

Directors:

Oliver Caroe RIBA AABC
Mark Hammond RIAS RIBA AABC

Associates and Designers:

Touseer Ahmad RIBA AABC CEPH
Matthew Cox RIBA CA MAPM
Andrew Senior ARP

Surveyor to the Fabric

Your Ref:
Our Ref: 24/02695/OBS



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16199701/006226/001/001

Amy Williams
PO Box 270
Guildhall
London
EC2P 2EJ

8th October 2024

RE: REQUEST FOR OBSERVATIONS

Dear Amy Williams

DECISION NOTICE
TOWN AND COUNTRY PLANNING ACT 1990.

REQUEST FOR OBSERVATIONS

I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 24/02695/OBS Date of Application: 10.09.2024 Date of Decision 08.10.2024

Proposed Development At:
Adjoining Borough Observations Within The Corporation Of London

For: Observations on a proposed development within the adjoining Borough of City of London with respect to demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b)) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works at Tenter House 45 Moorfields London EC2Y 9AE.

Approved Plans

Cover Letter dated 9 September 2024

Conditions

Lambeth Planning
PO Box 80771
London
SW2 9QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

1 The London Borough of Lambeth raises no comment to the proposal.

Notes to Applicant:

Yours sincerely



Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 8th October 2024

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Agenda Item 5

| | |
|--|---|
| Committee: | Date: |
| Planning Applications Sub Committee | 29 th October 2024 |
| Subject: 65 Fleet Street, London EC4Y 1HT Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.465m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works. | Public |
| Ward: Castle Baynard | For Decision |
| Registered No: 24/00648/FULMAJ and 24/00649/LBC | Registered on: 21 st June 2024 |
| Conservation Area: Part within Fleet Street Conservation Area | Listed Building: 2x Grade II |

Summary

Planning Permission is sought for:

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.465m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Listed Building Consent is sought for:

External and Internal alterations to The Tipperary Pub including part demolition of the rear of the pub; erection of 1 storey roof extension containing student accommodation with associated expansion into northern block of 65 Fleet Street at fifth floor level. Works to improve access to Whitefriars Crypt with changes to the surrounding structure of the Crypt to allow for presentation and interpretation of the asset.

Overall proposals:

The proposed development would deliver a retrofit and extension development scheme that optimises the potential of the application site through the re-provision and enhancement of the existing pub, enhanced public realm and the provision of much needed learning space in association with the applicant's preferred partner St Brides Foundation. The proposals also enhance access to the existing Whitefriars Crypt all of which is achieved through the provision of student accommodation.

The student accommodation would provide 856 student rooms, 35% of which will be affordable. The rooms represent a range of typologies, including studios and shared accommodation. 5% of the bedrooms are proposed to be wheelchair accessible, with a further 5% designed to be wheelchair adaptable.

In addition to the student accommodation, the proposed development makes provision for 1,503.68 sqm (GIA) cultural and community use to be curated and operated by the St Brides Foundation and set over part of the ground and lower ground floors.

The original submission has been revised with amended plans and supporting documents being received on the 29th August 2024 following initial Officer comments. The amendments proposed a reduction in the bulk and massing of the upper extension of the southern block. The student rooms proposed on the tenth floor have been removed, to deduct a significant amount of bulk and massing of this storey in order to reduce impacts on the setting of surrounding heritage assets - particularly the Temples Conservation Area and the listed buildings along Kings Bench Walk. As a result, Level 10 now only proposes to provide access to an external amenity terrace as well as containing some plant, requiring a smaller scale extension at this level.

The Applicant has provided a viability assessment to justify the loss of office at the site which has been independently reviewed. It is considered that the loss of office floorspace would be acceptable in this instance. The proposed uses of student accommodation and cultural space would not compromise the primary business function of the City.

The development would provide for student well-being and activities, ensuring a range of accessible, internal and external, communal amenity space. The provision of purpose-built student accommodation in this mixed-use development would not prejudice the business function of the City, would not result in an excessive concentration of student housing and is not considered to have an adverse impact on residential amenity of surrounding properties. Whilst there may be a lower levels of light to some of the bedrooms and kitchen areas, there are constraints around the retrofit of the existing building and it is considered that students would have the option of using amenity, breakout and study areas located throughout the building, along with the use of the publicly accessible roof terrace. The proposals also include 35% affordable student bedspaces and provides for 10% accessible rooms. It is therefore considered that the purpose-built student accommodation would accord with London Plan and Local Plan Policies and is considered acceptable.

The proposal would deliver two elements of cultural community use, comprising cultural space with the intended occupier being the St. Bride's Foundation as well as the opening and curation of the Whitefriars Crypt at the south of the site.

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

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

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

The proposed cultural uses, student accommodation and public realm proposals would enrich the existing learning and educational offer to deliver a vibrant wider neighbourhood, both during the day and at night, in accordance City's broader visions to deliver outstanding places, as part of 'Destination City', 'City Recharged' (2020), 'Future City' (2021) and 'Culture and Commerce' (2021).

Fleet Street is a dynamic area, having developed organically and has a 'loose fit' urban structure, eclectic in character and which has continuously evolved over time. The proposals are considered to be appropriately designed to be distinct yet complementary to the characteristic eclecticism and family of high quality buildings along Fleet Street and its surrounds.

In pan-London and strategic views the development would preserve the setting of St Paul's Cathedral as the Strategically Important Landmark which go to the heart of the character and identity of the City and London. The proposal would protect views of relevant City Landmarks and Skyline Features with the exception of some slight diminishment to St Brides Church.

The proposals would preserve the significance and contribution of setting of all the identified heritage assets except that of St Brides Church (Grade I); Nos. 2 – 6 Kings Bench Walk (Grade I) and Nos. 3 North King's bench Walk (Grade II*); Inner Temple Registered Historic Park and Garden (RHPG) (Grade II); and the Temples Conservation Area, which would experience, via setting impacts, low to slight levels of less than substantial harm.

The proposals seek to make the optimal use of land within a sensitive location partially within the Fleet Street Conservation Area and within the setting of the Whitefriars and Temples Conservation Areas alongside numerous listed buildings and the Temple Registered Historic Park and Garden. There would be no harm to the character and appearance of the Fleet Street Conservation Area.

The proposals would result in improvements to The Tipperary public house following its recent reopening. The harm to the significance of The Tipperary (Grade II) is evaluated at less than substantial at the lowest end of the spectrum due to the loss of the rear walls, windows and lightwell at the pub. The extent of the alterations is limited to the rear, an area generally considered to be less sensitive to change, and overall the characteristic 17th century cellular floor plan, fittings and sensitive spaces towards the front of the pub are retained.

The Whitefriars Crypt would be subject to significant improvements, with the asset currently uncelebrated at the rear of the site with no clear public access arrangements nor step free access. A new mezzanine floor would be constructed with a platform lift providing step-free access to the asset, whilst a new structure would be constructed around the lightwell to allow for more internal space around the crypt. This would allow for exhibitions and displays of artefacts to accompany the Crypt to help support it as a new visitor destination.

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

The proposed development is on track to achieve an "Excellent" BREEAM assessment rating. High quality building fabric, passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond the new Part L 2021. The carbon impact of construction and maintenance has been minimised through high levels of retentions and considerate design which prioritises retrofit, reuses materials and designing out waste. The upfront embodied carbon emissions are calculated to be better than the GLA's Standard Benchmark. Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible, residential development. The building design responds well to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity.

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

With regards to external daylight and sunlight impacts, the submitted assessments conclude 62 Fleet Street would be most impacted as a result of the proposal, receiving a moderate adverse impact in terms of daylight and a major adverse impact in terms of sunlight to windows, and 148 Fleet Street faces a negligible daylighting impact and a minor adverse impact in terms of sunlight. Considering the existing poor daylighting/sunlighting factors, and the

tight knit urban context, although some minor and major adverse impacts have been identified in this case officers consider this to be acceptable overall.

Turning to internal daylight and sunlight, officers express some concern around the light levels to some of the student rooms and amenity spaces within the proposed development. The majority of the rooms failing to meet the relevant BRE guidance are to rooms on the lower floor levels, those which are north facing, and both the eastern and western elevations are impacted by the tight urban grain of the surrounding streets. Whilst concern remains, Officers consider that the site has been well optimised for its location, has struck the fine balance between daylight distribution and overheating with the variation in window design, and overall consider that the future students would experience good levels of amenity with access to a range of internal and external communal spaces that are well lit in parts. This is particularly given the building is being substantially retained, representing a significant design constraint which is then compounded by the existing tight knit urban grain of the surrounding street scene. It is also recommended that the layout of the rooms be optimised and secured by condition to ensure that desks are located in the brightest part of the rooms.

Overall, the daylight and sunlight impact of the proposed development on neighbouring properties is considered to be acceptable and in accordance with the requirements of the Local Plan, as well as London Plan and Draft City Plan.

The proposal has been designed to ensure that the site meets the highest standard of inclusive design. In order for the site and all of its proposed uses to full fill their goal of being an inclusive and welcoming place to live, visit and enjoy the highest accessibility standards and inclusive environments practices are essential. Great consideration has been given as to how to improve the public realm and the arrival experience to the building in order to secure the optimal solution for the greatest range of building users. Subject to further design details and an Access Management Plan, it is considered that the proposal accords with the access related policies outlined above. The proposal has also been reviewed by the City of London Access Group and Accessibility Officers. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies in the report below.

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

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

It is almost always the case that where major development proposals come forward there is at least some degree of non-compliance with planning policies, and in arriving at a decision it is necessary to assess all the policies and

proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

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

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

Recommendation

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

65 Fleet Street, London

| TOPIC | INFORMATION | | | |
|---------------------------------------|---|------------------|--|---|
| 1. HEIGHT | EXISTING | | PROPOSED | |
| | 48.44 AOD | | 55.465 AOD | |
| 2. FLOORSPACE GIA (SQM) | USES | EXISTING | PROPOSED | |
| | Public House (sui generis) | 244.99 | Public House (sui generis) | 670.91 |
| | Student (sui generis) | 0 | Student (sui generis) | 32,078.36 |
| | Learning & non-residential institutions (F1) | 0 | Learning & non-residential institutions (F1) | 1,503.68 |
| | Retail | 834.65 | Retail | 391.85 |
| | Office | 29,714.26 | Office | 0 |
| | TOTAL | 30,793.91 | TOTAL | 34,644.79 |
| | | | TOTAL UPLIFT: | 3,850.88 |
| 3. OFFICE PROVISION IN THE CAZ | Not applicable - application proposes the loss of office space. | | | |
| 4. EMPLOYMENT NUMBERS | EXISTING | | PROPOSED | |
| | c.20 FTE (building is vacant) | | 42 | |
| 5. VEHICLE/CYCLE PARKING | EXISTING | | PROPOSED | |
| | Car parking spaces | 24 | Car parking spaces | 1 |
| | Cycle long stay | 170 | Cycle long stay | 659 (meets London Plan Policy Standards) |
| | Cycle short stay | 0 | Cycle short stay | 74 (meets London Plan Policy Standards) |
| | Lockers | 0 | Lockers | 0 |
| | Showers | 0 | Showers | 0 |
| | Changing facilities | 0 | Changing facilities | 0 |
| 6. HIGHWAY LOSS / GAIN | None | | | |

| | | | |
|---|---|-------------|-----------------|
| | | | |
| 7. PUBLIC REALM | Existing public realm re-landscaped. | | |
| 8. STREET TREES | EXISTING | | PROPOSED |
| | There are currently no trees on the site. | | None. |
| 9. SERVICING VEHICLE TRIPS | EXISTING | | PROPOSED |
| | 44 per day | | 43 per day |
| 10. SERVICING HOURS | <p>There shall be no trips to the Site by Goods Vehicles or (save in the event of emergency) Facilities Management Vehicles which are servicing the cultural use, retail and student management or maintenance deliveries during the following hours: Between 0700 hours and 1000 hours: Between 1200 hours and 1400 hours Between 1600 hours and 1900 hours and for the avoidance of doubt these restrictions shall not apply to cargo cycle deliveries.</p> <p>There shall be no trips to the Site by Goods Vehicles or (save in the event of emergency) servicing the student accommodation which have been arranged by students themselves other than during the following hours: Between 0700 hours and 2300 hours Tuesdays to Saturdays inclusive: Between 0700 hours and 2100 hours on Sundays and Mondays</p> | | |
| 11. VOLUME OF RETAINED FABRIC | | | |
| | | North block | South block |
| | substructure | 100% | 100% |
| | superstructure | 80% | 70% |
| Façade* | 0% | 0% | |
| *463m ² of stone cladding panel is proposed for deconstruction and reuse in new facade | | | |
| 12. OPERATIONAL CARBON EMISSION SAVINGS | Improvement against Part L 2021: 32% GLA requirement: 35% | | |
| 13. OPERATIONAL CARBON EMISSIONS | B6: 8,024 tCO ₂ e or 229 kgCO ₂ e/m ² GIA B7: 239 tCO ₂ e or 7kgCO ₂ e/m ² GIA See paragraph 685. | | |

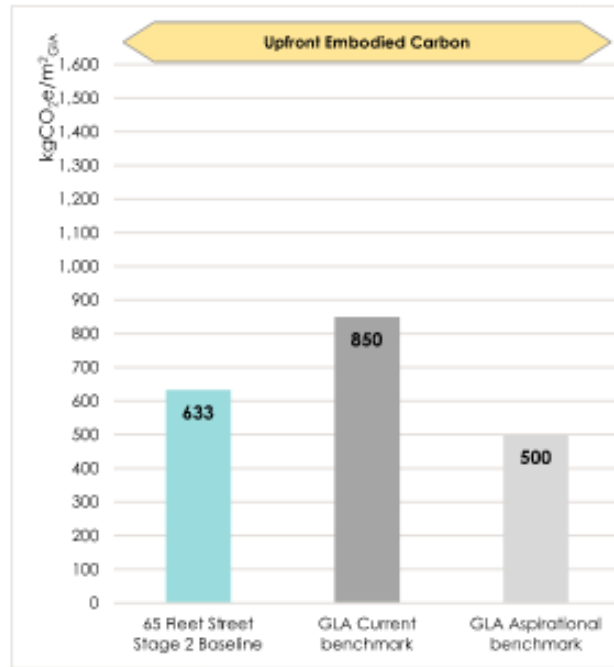
Also refer to page 8 of WLC report at Section 3.1
(based on June submission)

**14. EMBODIED
CARBON
EMISSIONS**

PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS

See paragraphs 666-669.

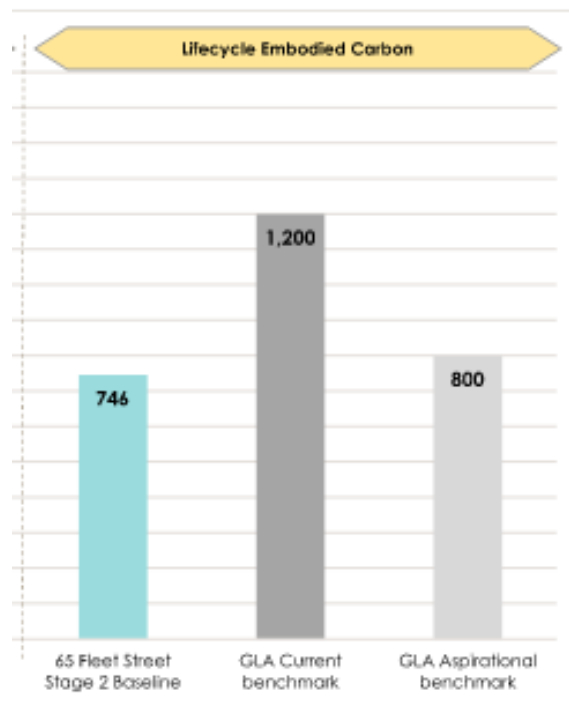
Also refer to page 11 of WLC report at Section 3.4



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

See paragraph 685.

Also refer to page 11 of WLC report at Section 3.4



**16. CARBON
OPTIONS
ASSESSMENT
-
LIFE-CYCLE
CARBON
EMISSIONS**

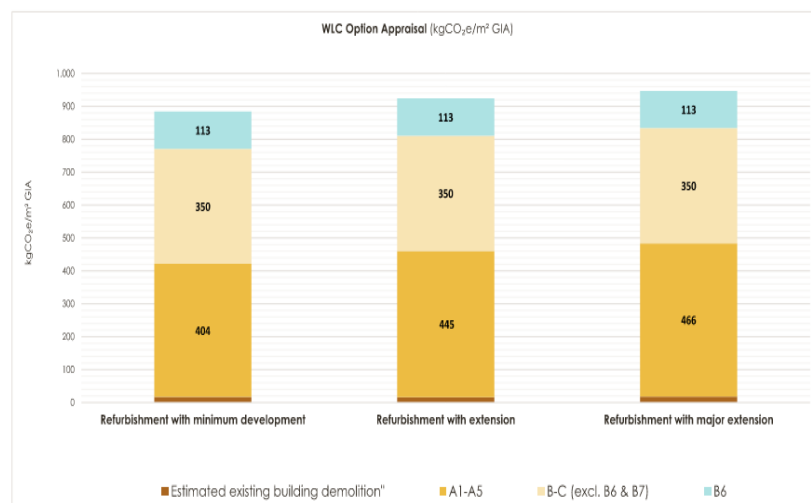
CARBON OPTIONS ASSESSMENT

Figures are separate to planning stage WLCA

See paragraphs 666-669.

Also refer to page 19 of Carbon Optioneering report at Section 4.4.5

| | Option 1 Refurbishment with min development | Option 2 Refurbishment with extension | Option 3 Major refurbishment |
|--|---|--|---|
| Upfront Embodied Carbon (A1-A5) (kgCO ₂ e/m ² GIA) <i>exc. sequestration</i> | 404 | 445 | 466 |
| Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO ₂ e/m ² GIA) | 704 | 795 | 816 |
| Operational Carbon for building lifetime (B6) (kgCO ₂ e/m ² GIA) | 113 | 113 | 113 |
| Total WLC Intensity (incl. B6 & pre-demolition) (kgCO ₂ e/m ² GIA) | 867 | 908 | 929 |
| Upfront Embodied carbon (A1-A5) (tCO ₂ e) | 12,243 | 14,684 | 16,378 |
| Operational Carbon for building lifetime (B6) (tCO ₂ e) | 3,437 | 3,743 | 3,986 |
| Total WLC (incl. B6 and pre-demolition) (tCO ₂ e) | 26,287 | 29,976 | 32,665 |



| | |
|----------------------------------|---|
| 17. TARGET BREEAM RATING | Target (minimum) Excellent, with the potential to achieve Outstanding |
| 18. URBAN GREENING FACTOR | 0.305 |
| 19. AIR QUALITY | Air Quality Neutral |

Site Location Plan



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ADDRESS:
65 Fleet Street

CASE No.
24/00648/FULMAJ

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



ENVIRONMENT DEPARTMENT

Site Photographs

Image



1:

Northern elevation of the northern block, containing The Tipperary (Grade II)



Image 2: The eastern elevation of the site, beyond the ongoing Salisbury Square development, from Fleet Street

Image 3: Birds down into the and southern northern block



eye shot looking central courtyard, elevation of the



Image 4: The Remains of the Whitefriars Convent (Grade II) visible within the lightwell on Ashentree Court / Magpie Alley

Image 5: The northern elevation of the southern block, showing the existing



main entrance and the central courtyard with lightwell



Image 6: The southern elevation of the southern block within Ashentree Court.



Image 7: The base of the existing lightwell in the centre of the courtyard

Main Report

Site and Surroundings

The Site:

1. The site occupies an area of 1.2 acres and is located on the southern side of Fleet Street, between Bouverie Street and Whitefriars Street. The site is bounded by Fleet Street to the north; Whitefriars Street to the east; Ashentree Court and Magpie Alley to the south; and Bouverie Street to the west.
2. The existing building was originally completed in 1989, and was previously occupied by law firm Freshfields Bruckhaus Deringer, before the company vacated the premises in 2019.
3. The site currently is made up of a part 5/ 7 storey building (Use Class E (g) (ii)) with a lower ground and a basement. The northern part of the building fronts Fleet Street, and includes the Tipperary pub, retail uses and office floorspace, comprising of 5 storeys. The Tipperary Pub, which claims to be London's first Irish Pub, dates to c.1667 and is Grade II listed. The southern part of the building is in office use, comprising of 7 storeys. The building also includes the Grade II listed Whitefriars Crypt at basement level of the southern building.
4. While the application site comprises one building, it is linked at lower ground level, a semi-enclosed courtyard at ground floor provides separation between the north and south parts of the building.
5. To the east side of the Site, there is a recently consented scheme (20/00997/FULEIA) for the redevelopment of 69-71 Fleet Street, 72-78 Fleet Street, 80-81 Fleet Street, 8 Salisbury Square, 1 Salisbury Square, 35 Whitefriars Street (Hack and Hop public house), 36-38 Whitefriars Street, 2-6 Salisbury Square (Fleetbank House), and 2-7 Salisbury Court which includes the demolition of the above buildings as well as the provision of three new buildings which are a new police headquarters, a new Class E building, and a combined court building (Class F1).
6. The northern section of the site is located within the Fleet Street Conservation Area. The site is adjacent to the Whitefriars Conservation Area which is located to the south.
7. There are two listed structures within the site; the Grade II The Tipperary Public House (No.66 Fleet Street) and the Grade II Remains of the Former Whitefriars Convent.
8. The Whitefriars Crypt is a 14th Century remnant of the Carmelite Monastery, possibly the Prior's mansion, that was located on the South part of the site.

The crypt was extensively excavated and restored in 1927. In 1989 when the surrounding buildings were demolished to construct 65 Fleet Street the crypt was moved to its present location, under the South Building off Magpie Alley and is accessed via appointment with the building management.

9. There are a number of heritage assets in the immediate vicinity of the site. These include Northcliffe House (Grade II), the Harrow Public House (Grade II), 24 Tudor Street (Grade II), 143 – 144 Fleet Street (Grade II), 146 Fleet Street (Grade II) and Ye Olde Cheshire Cheese Public House (Grade II).
10. Other designated heritage assets in the wider setting include, and not limited to: St Paul's Cathedral (Grade I), St Bride's Church (Grade I), Nos.1-7 King's Bench Walk (all Grade I), Nos.3 North & 8 King's Bench Walk (both Grade II*), Nos.9-13 King's Bench Walk (all Grade II), Daily Express Building (Grade II*), Nos.1-4 & 5 Paper Buildings (both Grade II), Inner Temple Garden (RHPG Grade II), Hamilton House (Grade II), Telephone House (Grade II), 9 Carmelite Street (Grade II), Sion College (Grade II), Former City of London School (Grade II), Unilever House (Grade II) and the Temples Conservation Area.
11. The closest neighbours are properties in the immediate vicinity are located at 61A Fleet Street, 62A Fleet Street, 3 Pleydell Street, 53A Fleet Street, 54A Fleet Street, 4-7 Lombard Lane, King's Bench Walk and Mitre Court Buildings to the west, Victoria House 25 Tudor Street and Temple House 6 Temple Avenue to the south, 24 Tudor Street to the east and 142 Fleet Street, 145 Fleet Street, 148 Fleet Street, 7 Hind Court and 2 Wine Court to the north of the application site.

Planning History

12. Planning permission was granted in 2020 under planning permission ref. 19/00058/FULMAJ for alterations and extensions to the existing building. Following this, in 2022, a Section 73 application was approved under reference 21/00709/FULMAJ for alterations to the building (also for the variation of condition 20 of the original application (19/00058/FULMAJ).

Proposals

13. Planning permission under LPA Ref 24/00648/FULMAJ is sought for:

For the partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.465m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses

including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

14. Listed Building Consent under LPA Ref 24/00649/LBC is sought for:

External and Internal alterations to The Tipperary Pub including part demolition of the rear of the pub; erection of 1 storey roof extension containing student accommodation with associated expansion into northern block of 65 Fleet Street at fifth floor level. Works to improve access to Whitefriars Crypt with changes to the surrounding structure of the Crypt to allow for presentation and interpretation of the asset.

15. The proposed scheme would provide a total of 34,644.79sqm (GIA) floorspace comprising:
- Public House (670.91sqm)
 - Learning and Non-residential institutions – Use Class F1 (including Crypt) (1,503.68sqm)
 - Retail (391.85sqm)
 - Student accommodation (Sui Generis) (32,078.36sqm)

Public House

16. The proposed scheme would include the refurbishment and enhancement of the Tipperary Pub, which has recently been brought back into use by the applicant following its closure in 2022.
17. The proposals as part of this scheme will look to enhance the provision of the pub through carefully thought-out refurbishment, increasing the floorspace from 244.99 sqm to 670.91 sqm (GIA) through extension to the building to the east at the lower ground floor, ground floor and first floor. The new ground floor area will allow for a larger area for drinking and eating. It is also intended that this space can be utilised for live music and events. New drinking areas will also be provided adjacent to the original bar area upstairs. The upper floors (second to fourth) will remain as they currently are, but with an addition of a lift to make the pub more accessible.
18. The proposed scheme would ensure important original pub features remain and the proposed extension is sensitively integrated. Works that effect the fabric of the listed pub are considered under the listed building application.

Learning and Non-residential institutions – Use Class F1 (including Crypt)

19. The proposed development makes provision for 1,503.68 sqm (GIA) of cultural use. The proposed scheme would provide cultural uses at ground floor and lower ground floor level with active frontages to principal elevation and internal courtyard elevations.
20. The Grade II Listed Crypt located in the southern portion of the building is proposed to be retained in its current location and raised in profile by creating a visitor interpretation space as well as providing improved wayfinding signage and an interpretation panel within the entrance colonnade off Fleet Street.
21. The Crypt also will be enhanced the lighting and interpretation panels within the space, providing a broader history of the Crypt and Friary.

Retail

22. The proposed scheme will provide 391.8 sqm (GIA) of retail space (Use Class E) focusing on the north-western corner unit. The two front units will be combined into one space and the connected to the first floor. The current ambition for the retail space is for a print and bookshop located on Fleet Street, which highlights the rich history of the print industry on Fleet Street.

Student Accommodation

23. The proposed scheme seeks to deliver 856 student rooms of which 35.02% will be affordable. The student rooms comprise of cluster and studio accommodation, as set out as follows:
 - Cluster Rooms (192 rooms)
 - Studios (593 rooms)
 - Wheelchair Accessible (86 rooms)
24. Student bedrooms are proposed to be provided on the lower ground floor to the ninth floor. These bedrooms would be located in both the southern and northern parts of the building. The entrance for the southern block is on Bouverie Street (featuring the reception lobby), while the northern portion is accessed via the passageway from Fleet Street.
25. The studio accommodation range from 15.2 sqm to 45.7 sqm. Each studio is designed to accommodate a 1950mm x 1250mm bed and contains an en-suite and kitchenette. The cluster rooms make up for 22% of the total accommodation which have en-suites and communal kitchens, living and dining space to encourage social interaction and inclusion.

26. 10% of the rooms are wheelchair accessible studio rooms to meet the London Plan requirements. Moreover, wheelchair accessible rooms will have a wheelchair accessible kitchen.
27. As well as the provision of student bedrooms, the proposed development will also provide 1792.2 sqm of student amenity space. The amenity space will be both internal and external to the building, including a roof terrace located on the southern portion of the building. Internally, the amenity space will also be provided at the basement and lower ground floor level, providing spaces for students to meet and interact. The glazed dome at the top of the southern building will provide a centre piece of natural light to users of the student accommodation amenity space on the lower ground floor. Internal space has been tailored to meet different students' needs, and the design allows open space to flourish and natural light to brighten the building internally, while the outdoor space provides nooks for users to either interact with other users of the space or to provide a quiet oasis to undertake study work. The spaces allow harmony for both study spaces but also places for interactions to ensure that social inclusion is fostered between students.

Amended Plans

28. Amended plans and supporting documents were received on the 29th August 2024. The amendments relate to alterations to massing, articulation, and materials of the building design following on from the detailed discussions post-submission stage, surrounding the Temple View. The key design amendments include the reduction of the 10th floor level and continuation of setbacks up to floors 8 and 9 in order to improve the setting of neighbouring heritage assets and wider. The amendments also proposed changes to the materiality of the new upper floors and refinement of the façade treatment more generally.

Consultations

Statement of Community Involvement

29. The Applicants have submitted a Statement of Community Involvement dated June 2024 outlining their engagement with stakeholders which commenced in February 2024. Their community engagement programme included a dedicated project website, engagement with locally elected representatives, engagement with local stakeholders and direct liaison with residents and employees.
30. The applicant has engaged with key stakeholders and has conducted briefings with local stakeholders. Meetings with St Bride's Church and the Worshipful Company of Carmen, in addition to ongoing meetings and liaison with St Bride's Foundation and Fleet Street BID. Lady Lucy French, the CEO

of Fleet Street BID, also attended the public exhibition on the proposals, alongside Castle Baynard ward member John Griffiths.

31. A digital website was created and has been live since 19th February 2024. The website has remained live since its launch. During the consultation period (19th February - 4th March 2023) 108 users engaged with the website.
32. Engagement also included targeted delivery of a flyer to 1,168 residential and business addresses surrounding the application site. The flyer contained details of the proposals and consultation website, and invited residents to leave their feedback via completing the online survey. The flyer also contained details of the in-person drop in event, and invited residents to attend to offer their questions and comments.
33. The consultation was complemented by two interactive in-person street stalls, which sought to engage directly with those living, visiting and working in the vicinity of the site by inviting them to leave their feedback via the online survey. These were held on Thursday 22nd February and Monday 26th February. The Applicant also conducted an in-person drop-in exhibition to provide an opportunity for the local community to find out more about the plans and put any questions to members of the project team. This was held on Tuesday 27th February between 11:30am and 3:30pm at St Mary at Hill. Overall, there were seven attendees at the in-person exhibition and 22 survey responses were received throughout the consultation period.
34. The Applicant has also conducted extensive community consultation to shape the cultural strategy and Tipperary offer.
35. The applicant has also engaged with the City of London Corporation officers through formal pre-application process.
36. The Statement of Community Involvement concludes that the feedback received throughout the consultation period has been positive towards the introduction of student accommodation and other cultural uses at this location on Fleet Street.

Statutory Consultation

37. 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 letters and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.

38. The views of other City of London departments have been taken into account in the preparation of this report.
39. Following consultation feedback, as set out above, the applicant made design amendments, and these were received on the 29th August 2024. Accordingly, a 30-day re-consultation has been undertaken. Comments from the second consultation are also set out below.

| Date | Consultee | Summary of comments |
|--|--------------------------------|---|
| 17 th July 2024 16 th September 2024 | NATS Safeguarding | No objections. |
| 30 th July 2024 | Health and Safety Executive | <p>The cited fire safety standard states that where there is more than one common stair from an upper storey or part thereof, at least one such stair serving the upper storeys (or parts thereof) should terminate at ground level. Accordingly, one of the two stairs that serve level 10 should not continue to the basement.</p> <p>HSE acknowledges the applicant's commitment that CFD will demonstrate (section 7 of the fire statement), that 'the smoke extract system will be effective in preventing the flow of smoke into the escape stair...'. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.</p> <p>HSE welcomes the commitment to review and potentially add further safety measures.</p> <p>Mobility Scooter guidance for residential buildings has been produced by the National Chief Fire Council (NFCC) which will provide</p> |

| | | |
|--|----------------------------------|--|
| | | <p>guidance on fire safety provision. Further information in relation to e-bikes and e-scooter can be found at E-bikes and e-scooters fire safety guidance – NFCC</p> <p>Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.</p> <p>It is not clear if the existing hydrants are currently operational. It is understood that the applicant intends to check these once there is a construction presence. Should there not be an operational hydrant within 90m, an application will be made for a new hydrant.</p> <p>Officer Response: These matters are addressed in paragraphs 713 to 717 below, and those matters raised by the HSE which are to be dealt with at a later regulatory stage would be the subject of informatives attached to any decision.</p> |
| 1 st August 2024 | Environmental Resilience Officer | <p>The proposed development is partially compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.</p> <p>Requests a certain condition to be included.</p> <p>Officer Response: Conditions appended.</p> |
| 5 th August 2024 (FULL) 6 th August (LBC) | Historic England | <p>(FULL) In our view, the proposals are unlikely to harm the character and appearance of the Fleet Street conservation area and have the potential to enhance the significance of the listed remains of the Whitefriars Convent. The proposals also have the potential to impact on</p> |

| | | |
|--|---------------------|---|
| | | <p>the significance of heritage assets outside of the site through development within their setting. We recommend that further clarity is provided on those impacts and that any harm to heritage assets is adequately justified or mitigated, in accordance with policy.</p> <p>(LBC) We have drafted the necessary letter of authorisation (attached) for your authority to determine the application as you see fit and referred the case to the National Planning Casework Unit (NPCU). You will be able to issue a formal decision once NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.</p> <p>Officer Response: Addressed in paragraph 378 of this report.</p> |
| <p>8th August 2024 20th September 2024</p> | <p>Thames Water</p> | <p>Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p> <p>Agent Response: We are not proposing any excavation outside of the existing basement and we will ensure any necessary permits</p> |

| | | |
|--|----------------------------|--|
| | | <p>associated with cavity drainage are sought.</p> <p>Officer Response: Recommended informatives appended.</p> |
| 13 th August 2024 | Air Quality Officer | <p>Requests certain conditions to be included.</p> <p>Officer Response: Conditions appended.</p> |
| 22 nd August 2024 2 nd October 2024 | Lead Local Flood Authority | <p>Requests certain conditions to be included.</p> <p>Officer Response: Conditions appended.</p> |
| 28 th August 2024 | Transport For London | <p>Further clarity is required on the status of access to the courtyard within the site connecting Bouverie Street and Whitefriars Street</p> <p>Further information on the design of the cycle parking, including lift dimensions.</p> <p>A nighttime / dark hours ATZ using the same routes as the daytime completed ATZ.</p> <p>Stage 1 Road Safety Audit (RSA) and Designer's Response and Healthy Streets Check for Designers for all proposed highway works prior to determination.</p> <p>Further clarity is needed on the relationship between public and private space within the site.</p> <p>We would be supportive of implementing a new wayfinding strategy featuring Legible London signage.</p> <p>TfL must be consulted on discharge of the Student Move In Move Out Strategy.</p> <p>The routes from the site to Cycleway 6 should be assessed against the Cycle Route Quality Criteria.</p> <p>We request a PCL assessment of crossings at the junction of Whitefriars</p> |

| | | |
|---|------------------------------|---|
| | | <p>Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, Bouverie Street, Tudor Street.</p> <p>We request a contribution of £100,000 to increasing capacity of the existing docking station on Bouverie Street. Further consultation with TfL is required regarding construction plans, pitlanes and impact on Fleet Street.</p> <p>The final DSP, CLP and Travel Plan should be secured by condition. The Travel Plan requires more ambitious targets and funding for measures including free Cycle Hire memberships for future residents.</p> <p>Officers Response: Addressed at the Highways and Transportation section of this report, starting at paragraph 521.</p> |
| <p>10th September 2024</p> | <p>City of London Police</p> | <p>The current proposals whilst generally acceptable, we have raised a number of concerns within the development, which will directly impact on the safety and security of the build and have a likelihood of affecting the community.</p> <p>Due to the high number of student domiciles that have been proposed to be included into the development, City of London Police feel that it would be appropriate and proportionate to apply a condition of build to the project, that they secure a minimum of Silver Award certificate of secured by design for homes. This will help to ensure that the residents and common users will have an enhanced feeling of safety and security inside of their abodes.</p> |

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| | | <p>Similar student accommodation sites within the City of London area have already decided to include SBD as a standard within their build environments. It has been noted that new Student accommodation that has achieved Secured By Design have seen a dramatically lower crime output that comparable sites without accreditation. Older adjacent sites within the local area of Fleet Street have seen the introduction of retrofitted additional security measures.</p> <p>The security measures that have been introduced would draw an inference that they were necessary to safeguard residents and commercial buildings due to reported crime and antisocial behaviour within the area. Within the plans are proposals for further retail and commercial office spaces, again we would recommend that the developers be conditioned to build these integrated units to achieve a minimum Silver Award of Secured by Design Commercial.</p> <p>Officer Response: Relevant condition appended, addressed in paragraph 129 of this report.</p> |
| <p>11th September 2024</p> | <p>Health and Safety Executive</p> | <p>The cited fire safety standard states that where there is more than one common stair from an upper storey or part thereof, at least one such stair serving the upper storeys (or parts thereof) should terminate at ground level. Accordingly, one of the two stairs that serve level 10 should not continue to the basement.</p> <p>HSE acknowledges the applicant's commitment that CFD will demonstrate (section 7 of the fire</p> |

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| | | <p>statement), that ‘the smoke extract system will be effective in preventing the flow of smoke into the escape stair...’.</p> <p>However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.</p> <p>HSE welcomes the commitment to review and potentially add further safety measures.</p> <p>Mobility Scooter guidance for residential buildings has been produced by the National Chief Fire Council (NFCC) which will provide guidance on fire safety provision. Further information in relation to e-bikes and e-scooter can be found at E-bikes and e-scooters fire safety guidance – NFCC</p> <p>Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.</p> <p>It is not clear if the existing hydrants are currently operational. It is understood that the applicant intends to check these once there is a construction presence. Should there not be an operational hydrant within 90m, an application will be made for a new hydrant.</p> <p>Officers response: Addressed in paragraphs 713 to 717 of this report, and informatives appended concerning CFD modelling and identifying operational hydrant.</p> |
| 12 th September 2024 | Environmental Health Officer | Requests certain conditions to be included. |

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| 26 th September 2024 | | Officer Response: Conditions appended. |
| 2 nd October 2024 | Historic England (GLAAS) (FULL and LBC) | Recommends no Archaeological Requirement. |
| 9 th October 2024 | District Surveyors | We will not comment on gateway 1 applications as this is HSEs role as statutory consultee. |
| 10 th October 2024 | The Gardens Trust | Proposed development will cause detrimental effects. Officer Response: addressed in paragraph 407 and 408. |
| 14 th October 2024 | Conservation Area Advisory Committee | No objections to the proposed uses. There were no objections to the proposals as far as they affected the detailed treatment of the buildings in the Fleet Street Conservation Area, including the added storeys and the new entrance. As far as the longer views were concerned the Committee expressed reservations about the raised height of the south block in the proposals. Members were concerned about the apparent bulk and horizontal character of the proposal shown in the views from sites on the South Bank, though accepting that the zoom images may have accentuated the harmful effects of the proposals, but were especially concerned by the effects of the proposals in the view from the Temple – View 12 in the applicant’s HTVI – which the applicants Heritage, Townscape and Visual Assessment accepts might do some harm. The Committee considered this to have an adverse effect on the Temple Conservation Area. |

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| | | <p>The Committee also wondered whether the proposed recladding of the existing building in GRC would introduce an unwelcome new material into the City's townscape.</p> <p>Officer Response: addressed in paragraphs 178, 451 and 452.</p> |
| 14 th October 2024 | NHS North East ICB | <p>Request for a contribution of £45,000 towards the mitigation of the adverse impacts of the development on local health infrastructure. This sum will enable the reconfiguration and upgrading of non-clinical space to clinical space and is considered to meet the tests set out in the CIL Regulations for contributions. Given the scale of the proposed development the impact across all types of health infrastructure will be significant and will require mitigation.</p> <p>Daylight - It is important to ensure that communal spaces or those where students may study or spend daytime has maximum daylight.</p> <p>Lifts - Should be large enough for a trolley bed and two paramedics with their equipment.</p> <p>Pedestrians and Cyclists – It is important that pedestrians are considered separately as there can be conflict between cyclists and pedestrians, and cycle parking/storage should be safe and accessible. There should be adequate parking for emergency vehicles and for service vehicles to ensure pedestrian routes are not impeded.</p> <p>Noise - It is important that there is adequate insulation between units to ensure privacy, and noise can be a contributor to stress and poor health.</p> <p>Public Realm - An ongoing management plan is important, and</p> |

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| | | <p>should be secured via condition or the S106 agreement.</p> <p>We consider a modest contribution of £45,000 for enabling the conversion of non-clinical space (administrative or storage for example) to increase clinical capacity alongside the arrival of the new student population is important in the short term. This is a modest, but important contribution. The calculations from the HUDU Planning Contributions Model indicates the capital cost to the NHS of creating additional capacity could be in the region of £1.7m. While this assumes new buildings/extensions it does not include outpatients, accident and emergency and ambulance infrastructure.</p> <p>Agent Response: While the submitted HIA clarifies that there is there is sufficient GP capacity locally, the requested contribution is agreed.</p> <p>Officer Response: This is addressed further in paragraphs 653 to 659 of this report, with the applicant agreeing to the requested contribution.</p> |
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Letters of Representation

40. 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. A total of 19 responses have been received in support of the application and 4 neutral comments. Comments in support were supportive of the retrofit strategy, improvements to Fleet Street and local area, sustainable design approach, refurbishment of the Tipperary public house, provision of high quality purpose built student accommodation and the delivery of new public/cultural spaces with the aim to deliver a print related visitor experience and learning centre. Other comments were supportive of the social and economic benefits the scheme would generate. Letters of support were received from the Guildhall School of Music and Drama, Fleet

Street Quarter, Dr Johnson's House and The Inns of Court College of Advocacy.

41. It is noted that all material planning consideration raised in the representations above are addressed within this report.

Policy Context

42. 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.
42. The City of London (CoL) has prepared a new Local Plan, the City Plan 2040, which was published for Regulation 19 consultation in the Spring of 2024 and submitted to the Secretary of State in late Summer 2024. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
43. 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.
44. 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

45. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
46. 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.
47. 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.
48. 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).
49. 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.
50. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
51. 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.
52. Paragraph 97 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
53. 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*”.
54. 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.

55. 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”*.
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. 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.
64. 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.*"

65. 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.”*
66. 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.”*
67. 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”.*
68. 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

69. 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).
70. 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).

71. 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

72. In determining the planning application, 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.
73. 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.
74. The principal issues in considering this application are:
- a) The principle of development, including the proposed student accommodation use and associated retail uses.
 - b) The economic impact of the proposal.
 - c) The impact of the development on the character and appearance of the area and the design of the building itself.
 - d) The impact of the development on designated and non-designated heritage assets.
 - e) The impact on strategic views in the London Views Management Framework and on other strategic local views.
 - f) The impact of the development on public realm.
 - g) The impact of the development on ecology.
 - h) The accessibility and inclusivity of the development
 - i) The impact of the development on any potential archaeological assets beneath the site.
 - j) The impact on the development in highway and transportation terms.
 - k) The impact of the development in terms of energy, sustainability and climate change.
 - l) The acceptability of the scheme in terms of its environmental impacts, including solar glare, daylight and sunlight, thermal comfort, noise and vibration, air quality and contamination
 - m) The impact of the proposed development on the amenity of nearby residential and other occupiers.
 - n) The impact of the development on health and wellbeing.
 - o) The impact of the development on fire safety.
 - p) The acceptability of the proposed security, suicide prevention and fire safety arrangements
 - q) The requirement for the development to secure financial contributions and planning obligations.

- r) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and The Human Rights Act 1998

Principle of Development

Loss of Office Floor space

75. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
76. London Plan Policy E1 supports increases in the current office stock. Likewise, Core Strategic Policy CS1 of the Local Plan and Strategic Policy S4 of the Draft City Plan 2040 seek to ensure that the City provides additional office accommodation to meet demand from long term economic and employment growth.
77. The existing lawful use of the site is employment (office) (Use Class E (g) (i)). Having being previously occupied by law firm Freshfields Bruckhaus Deringer as their global headquarters, until they vacated in 2019. A Small portion of the offices are currently in use as a construction site office. However, the building is currently stripped to shell and core out as part of the previous planning consent (21/00709/FULMAJ).
78. This application would result in the loss of 29,714sqm (GIA) of existing Class E(g) office floorspace.
79. London Plan Policy E1 supports increase in current office stocks, especially within the central London office market. The City of London Local Plan 2015 and the proposed Submission Draft City Plan 2040 promote the delivery of a world class business city and the protection and provision of office floorspace. Local Plan policies CS1 and DM1.1 and proposed Submission Draft City Plan 2040 policies S4 and OF2 seek to protect existing office accommodation.
80. Local Plan Policy DM1.1 and draft City Plan Policy OF2 seek to protect office accommodation. Policy DM1.1 seeks to prevent the loss of existing office accommodation where the building is considered suitable for long term viable office use and there are strong economic reasons why the loss would be inappropriate. *“Losses would be inappropriate for any of the following reasons:*
- *prejudicing the primary business function of the City;*
 - *jeopardising the future assembly and delivery of large office development sites;*
 - *removing existing stock for which there is demand in the office market or long term viable need;*

- *introducing uses that adversely affect the existing beneficial mix of commercial uses.”*
81. To meet the requirements of Core Strategic Policy CS1 and Policy DM 1.1, applicants proposing the loss of office accommodation will need to provide robust evidence relating to the current and long-term unsuitability of the site for office use and that the proposed change would not adversely affect the existing beneficial mix of commercial uses in the area or prejudice the primary business function of the City. Applicants will need to provide robust evidence to demonstrate that the building has depreciated such that office use is not viable or suitable in the long-term. Evidence will need to address the physical state of the building and its functional and locational obsolescence. Marketing evidence will be required to show that there is no recent or likely future demand for continued office use on a site.
 82. Emerging Policies S4 and OF2 of the draft City Plan require the protection of existing office stock from being lost to other uses where the existing floor space would be viable in the longer term or where the loss would cause harm to the primary business function of the City.
 83. Evidence provided in support of planning applications should take into account the potential for the building to meet a variety of office needs including, where appropriate, the potential for sub-division to provide smaller office suites, the potential to provide accommodation suitable for start-ups or ‘move-on’ accommodation and the potential for comprehensive redevelopment to re-provide office floorspace.
 84. The Office Use Supplementary Planning Document sets out detailed criteria for evaluating the long-term viability of office accommodation and requires the submission of a viability appraisal and evidence of marketing in support of an application for change of use.
 85. The applicant has submitted an economic viability assessment. The City Corporation appointed independent consultants to review the Assessment and provide advice to the City Corporation on whether the assessment meets the terms of Policies CS1 and DM1.1 and emerging policies S4 and OF2.
 86. The applicant’s viability assessment and the City Corporation’s consultant review consider the viability of development at current day costs and values.
 87. The applicant’s viability assessment has looked at 2 scenarios as follows:
 - The consented office remodel/extension scheme (Scenario 1);
 - A larger office remodel/extension scheme within the envelope of the proposed student-led mixed-use scheme (Scenario 2).

88. Overall, the City Corporation's consultant concludes that the none of the scenarios of building out the now implemented scheme or a larger scheme which fills the envelope of the proposed development subject of this application are financially viable and therefore that this site would not be viable in the longer term for future office use. The viability information submitted in support of the application has been subject to third party review, with the reviewer concluding that they agree with the applicant's advisors assessment that both scenarios tested would be unviable.
89. Turning to the marketing evidence recommended by the Office Use Supplementary Planning Document. The applicant has submitted a Commercial Office Market Report authored by CBRE and appended to the Financial Viability Appraisal. The report concludes that over 150 parties contacted during the marketing period for the site, 11 parties progressed to the bidding stage, and notes that a number of interested investors/developers expressed concerns over whether targeted sustainability credentials such as an EPC B rating and a BREEAM 'Excellent' could be met within the constraints of the existing permission. Supplementary to this, it concludes that the property was marketed on a pre-let basis with approximately 20 target tenants, with no tenants prepared to commit to the site.
90. In conclusion, the principle of a change of use from office to an alternative use is satisfied in accordance with Local Plan policies CS1 and DM1.1, proposed Submission Draft City Plan 2040 policies S4 and OF2, and the Office Use SPD.
91. The loss of office floorspace on this site is not considered to be significant when considered against the existing and pipeline floorspace in the City of London, including those schemes which this Committee has resolved to permit but which have not progressed yet to full permission. Whilst the Local Plan resists the loss of office floorspace, the scale of the loss on this site would not prejudice the overall supply of office space in the City, nor prejudice the potential for future site amalgamation or result in the loss of existing stock for which there is demand or longer-term viable need.
92. To conclude, the viability assessment demonstrates that continued office use of the site is unlikely to be a viable proposition and that alternative uses should be considered. It has also been demonstrated that both the implemented scheme and an alternative scheme are not viable options. It is therefore considered that the loss of existing office floorspace would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. It is considered that the proposed high quality student accommodation will contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for seven days per week and

contribute to the achievement of the City Corporation's Destination City ambitions and align with the City Corporation's wider ambitions for a post-Covid City.

93. The loss of office accommodation is therefore considered to be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan 2040.

Public House

94. London Plan policy HC6 'Supporting the nighttime economy sets out planning decisions should protect and support the evening (and night-time) venues such a public houses. London Plan Policy HC7 (Protecting Public Houses) states that boroughs should protect public houses where they have a heritage, economic, social or cultural value to communities and applications for the loss of public houses should be refused. Policy DM1.5 aims to encourage a mix of commercial uses within office developments which contribute to the City's economy and character.
95. The Tipperary Pub is a Grade II Listed Building. Accordingly Local Plan policy DM12.3 'Listed buildings' also applies. The policy sets out that the City will resist the demolition of listed buildings and will grant consent for the alterations to a listed building only where this would not detract from its special architectural or historical interest character, or significance of its setting.
96. The proposed works include the extension into the neighbouring eastern portion of the building, increasing the floorspace from 243.5 sqm to 648.4 sqm (GIA) at lower ground floor, ground and first floors. With the upper floors (second to fourth) remaining the same with the addition of a lift to make the pub more accessible. The proposals also include a larger area for eating and drinking at ground floor level, with the space also being able to be utilised for live music or events.
97. Detailed analysis of the proposed works to restore the pub are addressed below. The proposals are in conformity with both emerging and adopted Local Plan policies. It is considered that the re-imagining of the public house accords with London Plan Policy HC6.

Learning and Non-residential institutions – Use Class F1 (including Crypt)

98. The Site falls within the CAZ and London Plan Policy SD4 outlines that within this area the unique concentration and diversity of cultural, arts and tourism functions should be promoted and enhanced.

99. The London Plan Good Growth objectives GG1 and GG5 are considered applicable to the provision of community and cultural use within development proposals. Policy S1 of the London Plan seeks to ensure that the social infrastructure needs of London's diverse communities are met. London Plan Policy HC5 supports London's culture and creative industries.
100. The Local Plan sets out in Policy CS11 that the City will seek 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 and cultural experiences, in accordance with the City's Corporation's Destination City Strategy.
101. Policy CS22 of the Local Plan seeks to maximise opportunities for the City's residential and working communities to access suitable, health, social and educational facilities and opportunities, whilst fostering cohesive communities and healthy lifestyles.
102. Emerging Policy S5 looks to encourage the vitality and vibrancy of the streets of the City of London. Whilst draft policy S6 'Culture and Visitors' looks to set out the City's vision of maintaining and enhancing the City's cultural offering. The policy draws out the importance of heritage in the City and seeks opportunities to create opportunities to celebrate the rich history in the city. Emerging Policy CV2 (Provision of Visitor Facilities) of the Draft City Plan 2040 encourages the provision of facilities that meet the need of visitors in new cultural developments.
103. The application site is also in the area which is designated as a key area of change (Fleet Street and Ludgate Key Area of Change) which is part of the Draft Submission of the City Plan. Fleet Street is identified in this document as one of the City's four Principal Shopping Centres and has a strong cultural offering.
104. The application proposes 1,503.68 sqm (GIA) of cultural floorspace, providing interactive learning spaces with the applicant's preferred partnership with the St Brides Foundation and an enhanced viewing area for the existing Whitefriars Crypt (Use Class F1). The scheme would also seek to provide creative wayfinding between all amenities within the application site. This would prominently indicate entrances to cultural spaces and integrate Lettering Art commissions that bring the cultural experience into the public realm.
105. The proposals in partnership with the St Brides Foundation seek to educate and engage in the story of print, derived from the meaning and value of Fleet Street and its location. At ground and lower ground floor levels, the proposals seek to create an interactive and engaging experience, telling the story of print through multisensory stimulation. The entrance will be via

Whitefriars Street, creating a vibrant and active frontage where activities can be seen through the windows.

106. The proposals also seek to enhance the accessibility and visitor experience of the Crypt. This will be achieved through the creation of a double height viewing gallery around the Crypt. A dedicated entrance will be provided via Ashentree Court, with enhanced visibility of the Crypt from both Ashentree Court and Magpie Alley. Disability access will also be provided by a new platform lift.
107. The proposals are considered to deliver a scheme that would respond to the above policies, delivering new cultural uses and visitor attractions to the City which contribute to the local vibrancy and appeal. Moreover, it will celebrate Fleet Street's nationally important achievements in print and media.
108. A section 106 obligation would be required to secure the provision of a proposed uses, including a management plan, opening hours and the securing of a cultural partner, officers consider these obligations to be necessary to the delivery of the proposed Learning and Non-residential institutions – Use Class F1.
109. The proposed Learning and Non-residential institutions – Use Class F1 spaces would contribute to the cultural and community offer in this part of the City. It is therefore complimentary with Policy HC5 of the London Plan and emerging Policies S6 and CV2 of the draft City Plan.

Retail

110. The site is within a designated Principal Shopping Centre (PSC) on Fleet Street.
111. London Plan policy E9 'Retail, markets and hot food takeaways' is supportive of the provision of retail which promotes a sector which is successful, competitive and diverse which provides a sustainable access to goods to Londoners.
112. Local Plan paragraph 3.20 'Retailing' highlights that retail contributes to the City's vitality and provides important services to the City's communities. The Plan identifies that Fleet Street is one of the City's Principal Shopping Centres with new retail development not compromise the City's primary business function.
113. Policy CS20 'Retailing' is supportive of new retail where it is provided with Principal Shopping Centres, in the way of achieving the target of the gross increase in relation floorspace by at least 136,000m² by 2026.

114. Within the Emerging City Plan Strategic Policy S22 'Fleet Street and Ludgate' outlines that the City are supportive of complementary retail units in the predominantly office location which enhance the areas rich heritage and culture. Moreover, the policy sites that the retention of retail within Fleet Street is supported where it encourages a greater diversity of retail.
115. The proposal seeks to create active frontages through the re-provision of retail, specifically located in the north western area of the Site. The proposal seeks to create 391.85 sqm of retail space which will reinvigorate the ground floor. The primary retail unit which this application proposes is the new print/bookshop on Fleet Street giving nod to Fleet Street historic link to the print industry.
116. The proposed retail provision as part of this application is supported by both the adopted and emerging policy at both the London and local level. The provision of retail which is proposed compliments the mix of uses on the Site, giving nod to Fleet Street's rich heritage and connections to the print industry.

Student Accommodation Use

117. In considering the student housing element, regard must be had to the need for student housing, the suitability of the site for delivering student housing and the quality of accommodation that would be delivered.
118. London Plan policy H15 encourages the development of purpose-built student accommodation to meet demand in London.
119. Local Plan Policy DM21.7 and draft City Plan Policy H6 states that student accommodation would be acceptable where it would not prejudice the primary business function of the City, result in the loss of office (contrary to Local Plan Policy DM1.1), result in an excessive concentration of student accommodation, or have an adverse impact on the residential amenity of the area. Policy DM21.7 also states that proposals for purpose-built student accommodation should be supported by identified further or higher educational institutions operating in the City of London or CAZ.
120. London Plan Policy SD5 and Local Plan Policy DM21.1 states that residential development is not appropriate in defined parts of the City of London. The Local Plan identifies clustered locations for the delivery of future housing developments. The Local Plan recognises that a thriving residential community contributes to the City of London's vitality and makes it livelier and safer outside working hours.
121. The proposal would deliver 856 rooms of Purpose-Built Student Accommodation with ancillary communal spaces and external roof terraces.

The accommodation and ancillary spaces would be provided over 9 floors above ground floor level. The 856 rooms would provide a mix of bedroom types including studios and cluster apartments, with 10% proposed to be wheelchair accessible. 35% of the units will be affordable, provided at a rent level capped by the Mayor of London, in line with London Plan policy H15.

122. It is considered that the proposal would not result in a development which would prejudice the primary business function of the City and consider the proposal acceptable in this regard.
123. The proposed development would not result in a loss of viable office accommodation and would not be contrary to Policy DM1.1 for the reasons set out in the above section of this report.
124. Student accommodation contributes towards the City's housing target at a ratio of 2.5 student flats to 1 permanent residential dwelling. Therefore, the provision of 856 student flats would count as 342 residential units towards the City's housing land supply and delivery target.
125. The City's annual housing target is 146 dwellings per annum, therefore, 342 dwellings from this development proposals would equate to just over 2 year's housing supply.
126. The applicant has submitted an Economic Benefits Statement which as well as the wider benefits of the scheme also includes the added value generated by student accommodation. It states that students spend off campus on a variety of goods and services including food, clothing, bars and cafes and that the presence of students in any particular area often coincides with the presence of retail and retail services which can add to the vibrancy and vitality of high streets and increase weekend and evening activity in an area making a valuable contribution to the wider economy as well as helping to support a safer and more welcoming area at night. The statement advises that the development could generate up to £10.2m in student spending every year thus supporting a total of 43 FTE (28 direct jobs and 14 indirect) jobs.
127. A draft Student Management Plan has been submitted which addresses traffic management, out of hours emergency management, security, working with neighbours to minimise disturbance, code of behaviour and conduct for students and refuse/waste management. The student housing will be managed 24/7 by a dedicated operator, by 9 full-time staff and contracted cleaning and security services.
128. Environmental Health have reviewed this application and have not raised any objection on the grounds of noise or disturbance to nearby occupants.

129. The City Police have reviewed the application and consider the scheme to be acceptable in general but have raised a number of issues regarding the development, which could directly impact on the safety and security of the build and have a likelihood of affecting the community. With the inclusion of the proposed development, there may be an increase in the opportunity for crime in this area based on current crime statistics in the local area. Given the extent of development in close proximity to the application site, City Police have commented that it is essential that this site is held in keeping with the high standards of security and maintenance of neighbouring buildings, one of note will be the Salisbury Square development, housing the new Police Headquarters and Courts within the City of London. Internally within the site, City Police have recommended further compartmentation to ensure that penetration into the site would be limited.
130. Due to the high number of student domiciles that have been proposed to be included into the development, City of London Police commented that it would be appropriate and proportionate to apply a condition of build to the project, that they secure a minimum of Silver Award certificate of secured by design for homes. This will help to ensure that the residents and common users will have an enhanced feeling of safety and security inside of their abodes. City Police note that that new student accommodation that has achieved Secured By Design have seen a dramatically lower crime output that comparable sites without accreditation. Older adjacent sites within the local area of Fleet Street have seen the introduction of retrofitted additional security measures. The security measures that have been introduced would draw an inference that they were necessary to safeguard residents and commercial buildings due to reported crime and antisocial behaviour within the area.
131. As such, it is considered that a condition to require the submission of details regarding the opportunities to design out crime are to be submitted for consideration by the City of London Police. The proposed conditions are in keeping with the City of London Local Plan 2015 and proposed Plan for 2040.
132. Officers consider that there would not be an unacceptable impact on the amenity of nearby residential properties and that there would unlikely be a significant rise in anti-social behaviour as a result of the student accommodation if the accommodation were to be run in accordance with a Student Accommodation Management Plan. Officers consider that as part of the final Student Accommodation Management Plan a strategy to ensure litter in and around the student accommodation is managed adequately.
133. If permission were to be granted a detailed Student Accommodation Management Plan would be required as part of the Section 106 Agreement

to ensure a detailed and ongoing management of the student accommodation is provided.

134. Officers consider that there would not be an unacceptable concentration of student accommodation in this area.
135. Proposals for student housing must be supported by identified further or higher educational institutions operating in the Central Activities Zone and provide accommodation for their own students.
136. The applicants have commissioned a Student Housing Supply and Demand Study which concludes that London's supply of Purpose Built Student Housing (PBSH) does not meet the accommodation needs to house London's students, with approximately 131,000 students having to find accommodation outside of the PBSH sector.
137. The applicant is currently engaging with local Higher Educational Institutions with an interest in securing at least a majority of the rooms at the proposed development. These discussions draw from the applicants' recent experience engaging with institutions to deliver other schemes in London.
138. The applicants will need to ensure an arrangement for nomination rights with an appropriate higher education provider is secured for all of the proposed housing units prior to occupation through a S106 agreement in line with Policy DM21.7.
139. Policy H15(A)(5) of the London Plan requires that student accommodation provides adequate functional living space and layout. Local Plan Policies DM21.1(Location of New Housing) states new housing (including student accommodation) will only be permitted where development would not result in poor residential amenity within existing and proposed development.
140. The student accommodation element will be accessed via the ground floor for both the northern and southern element of the building. As well as the student rooms there will also be communal amenity space for students. The spaces which are for communal use have been designed to provide a series of thought through and consciousness spaces fitted to meet the needs of the students and equate to 2.05sqm per student, which is above the national average (premium) of 1.89sqm.
141. The internal daylight and sunlight conditions of student spaces and rooms contributes to the amenity of these space. The applicants have submitted an internal daylight/sunlight assessment of the building, including student bedrooms and communal spaces. It is expected that not all rooms would meet the criteria set out by the BRE guidelines. Officers are concerned about the results achieved by a number of rooms, particularly those on the

lower ground floor levels and overlooking the internal atrium, but it is reasonable to expect the rooms to fall below guidance in the dense city centre location.

142. Officers consider that the building design has been optimised, particularly with regards the fenestration, to allow for the most reasonable light levels to the rooms whilst also successfully overcoming concerns around overheating in the building. The compromise between daylight levels and overheating is finely balanced and Officers consider that the applicant has successfully achieved the right balance in this difficult context. Further, it is considered that the access to well-lit communal spaces including indoor amenity and outdoor terrace spaces would satisfactorily offset the lower-than-expected levels of daylight and sunlight in some rooms, with the prospective students receiving an acceptable level of amenity from these spaces and their rooms combined. It should also be considered that the room layouts are recommended to be optimised with desks in front of the windows to enhance the light levels available for study (secured by condition), and that the students would spend a good portion of their time away at their university campus.
143. As such, officers are satisfied that the internal daylight and sunlight achieved into student bedrooms would be acceptable in this instance as student rooms can be optimised through layout and students will have access to a diverse range of amenity spaces within the building.
144. The development would provide one main external communal amenity space on Level 10 as part of the proposed terrace offering. Other amenity space is proposed on lower ground floor level. The internal student amenities have been designed to promote neurodiversity through the provision of a variety of uses and space ranging from intimate to open plan areas to suit a wide range of student needs. The detailed design for student accommodation terraces, public realm and lower ground amenity associated with the cultural space should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users.
145. Provision is made for a range of amenities in the generous internal amenity space including lounges, study rooms, private dining spaces, cinema, gym, gaming room, karaoke room and music room.
146. Whilst there are no space standards for student accommodation, the development is considered to be fit for purpose and provide for student well-being and activities, ensuring a range of high-quality and accessible, internal and external, communal amenity space. The provision of purpose built student accommodation in this mixed-use development would not prejudice the business function of the City, would not result in an excessive concentration of student housing and is not considered to have an adverse

impact on residential amenity of surrounding properties. Whilst the level of light to some of the rooms and kitchen areas would fall below BRE guidance, officers are of the view that students would have the option of using amenity, breakout and study areas located throughout the building, along with the use of accessible roof terraces. The proposals also include 35% affordable student bedspaces and provides for 10% accessible rooms. On balance, the purpose-built student accommodation would accord with London Plan Policy H15, Local Plan Policy, CS5 and DM21.7 and Draft City Plan Policy HS6 and S23.

Architecture, Urban Design and Public Realm

Policy Context

147. The relevant Adopted Local Plan (2015) policies for consideration are CS10, DM10.1, DM10.2, DM10.3, DM10.4, DM10.5, DM10.6, DM10.8, CS16, DM16.2, CS19, DM19.1 and DM19.2; emerging Local Plan policies HL1, S5, RE1, RE2, S8, DE2, DE3, DE5, DE8, S10 and AT1; and London Plan (2021) policies D3, D4, D5 and D8. This is in addition to the relevant sections of the National Planning Policy Framework as well as the National Design Guide.

Existing Site and the Surrounding Townscape Context

148. The subject site at 65 Fleet Street comprises two blocks of commercial buildings on the southern side of Fleet Street. The site is bounded by Fleet Street to the north; Whitefriars Street to the east; Magpie Alley and Ashentree Court to the south; and Bouverie Street to the west. The two blocks are dissected by an east-west pedestrian route and courtyard between Whitefriars Street and Bouverie Street, which is also linked to Fleet Street via an archway. This route has been closed since the building was vacated following the Covid Pandemic and is in a state of disrepair.
149. The subject site comprises one larger commercial building which forms the southern block of the site, and a smaller commercial building with retail at base forming the northern block. The two blocks resulted from an extensive comprehensive redevelopment of the site in 1989/90 by YRM Architects as part of the then known "Whitefriars Scheme". The building replaced the former News of the World Headquarters following their relocation to Wapping.
150. The northern block of the site is located within the Fleet Street Conservation Area, whilst the southern block is not located within a conservation area. The southern boundary of the site abuts the Whitefriars Conservation Area, whilst the Temples Conservation Area is located to the west. The

development site is visible in views into and out of these surrounding conservation areas.

151. The site itself contains two Grade II listed buildings. The Tipperary Public House (No.66 Fleet Street) sits within the northern block of the site as a standalone building. The Remains of the Former Whitefriars Convent are located within the basement of the southern block – on the south eastern corner, alongside Magpie Alley / Ashentree Court. In addition, the site is located within the context of numerous other listed buildings assessed within the Heritage section of this report.
152. The smaller northern block faces directly onto Fleet Street and comprises a G+4 Storey (and basement) building with a height of 33.8m AOD. The northern block is integrated into the retained facades of Nos.63 and 67 Fleet Street which predate the YRM scheme, whilst No.66 (The Grade II Listed Tipperary) remains as a standalone element separate to the rest of the commercial building. Nos.64 and 65 are the only elements with a later façade associated with the YRM scheme, with an archway located at ground floor level of No.65 providing access to the southern block. Both Nos.63 and 67 provide robust, stone bookends to the stylistically varied group of buildings that form the façade of the northern block and are considered to be Non-Designated Heritage Assets.
153. The Grade II listed Tipperary Pub was recently reopened after a prolonged period of closure following the Covid 19 pandemic. Light touch works have been made to the pub already associated with its re-opening, including like-for-like cosmetic changes such as new paint on the ground floor frontage. The upper floors of the pub (Level 2 and above) are currently in a state of disrepair, with no step free access to the upper floors nor is there public access beyond the first floor bar and second floor toilets.
154. The larger southern block comprises a large G+7 Storey (and 2 lower levels) building, with a height of 48.49m AOD, situated on the site of a former printing works. The building is of a postmodern style, with a steel frame composite structure clad in light and dark grey granite and metal. The building presently has extensive facades which feel monotonous given the lack of depth to the building and the use of the same granite materiality across the building.
155. The Grade II Whitefriars Crypt is located within the basement level of the southern building, in the south eastern corner accessed from Ashentree Court. The crypt dates to the 13th or 14th centuries and this is from where Whitefriars derives its name. As part of the YRM scheme the crypt was relocated and moved to its present location where it could be viewed by the public. However, the asset is currently uncelebrated at the rear of the site with no clear public access arrangements nor step free access. The public

can view the crypt through windows via a staircase down to the lightwell from Magpie Alley. This is considered to be a dark and uninviting space at present.

156. The subject site sits on the edge of a cluster of larger commercial buildings which sit to the east and south of the site. The subject site is located to the west of the Salisbury Square Development including Court, Police Headquarters and a Commercial Building development, which is currently under construction. To the south of the site is Northcliffe House, (Grade II) recently subject to a refurbishment providing best in class office accommodation. To the west and north, the townscape is modest and more traditional in character, with buildings of a variety of architectural styles varying in height up to eight storeys.
157. The later YRM buildings of the northern block (Nos. 64 and 65) alongside with the Southern Block are considered to be unremarkable, with no apparent potential for inherent architectural, historic or archaeological interest and is not identified as a non-designated heritage asset. Nos 63 and Nos 67 Fleet also within the development site are identified as non-designated heritage assets.
158. The YRM buildings are not identified as a non-designated heritage asset nor does the development contribute positively to the settings of nearby designated heritage assets. Their refurbishment is supported in principle from a design and heritage perspective.

Design Proposals

159. The proposals would comprise the retention of the two existing blocks on the site, with rooftop extensions and a new façade associated with its change of use from office to student accommodation with cultural floorspace at the lower ground floor.
160. Fleet Street is a dynamic area, having developed organically over time and has a 'loose fit' urban structure, eclectic in character and which has continuously evolved over time. The proposals are considered to be appropriately designed to be distinct yet complementary to the distinctive eclecticism and family of high quality buildings along Fleet Street and its surrounds. Whilst the proposals would not result in any change to the existing urban grain and building lines, new facades would bring design benefits to the Fleet Street Key Area of Change. The improved public realm provided within the plaza which sits between the northern and southern blocks would benefit from improvements, including new areas of soft landscaping and seating to create an intimate and tranquil space for the public to enjoy.

161. The proposals would result in improvements to The Tipperary pub following its recent reopening, however, external works would be limited to repair works to the façades and windows. Internally, more extensive works are proposed including a new connection to the neighbouring unit at No.67 to create a new dining area. In addition, a new kitchen and dining rooms at the upper floors with a new lift located at the rear are proposed to provide inclusive access for all. The full details and assessment of the internal works are set out within the Built Heritage section of this report.
162. The Whitefriars Crypt would be subject to significant improvements, with the asset currently uncelebrated at the rear of the site with no clear public access arrangements nor step free access. The public can view the crypt through windows via a staircase down to the lightwell from Magpie Alley.
163. The Crypt would be retained in its current position, following its relocation as part of 1988 YRM scheme, with a new prominent entrance to be provided on the southern elevation of the southern block facing onto Ashentree Court. A new mezzanine floor would be constructed with a platform lift providing step-free access to the asset, whilst a new structure would be constructed around the lightwell to allow for more internal space around the crypt. This would allow for exhibitions and displays of artefacts to accompany the Crypt to help support it as a new visitor destination. At ground level, a new glazed active frontage would be provided allowing the public to view the crypt at ground level from Magpie Alley and Ashentree Court, providing new animation to this presently inactive space. New signage and wayfinding would be provided, alongside historical interpretation with details to be secured via way of condition. Further details of the proposals impacting this asset are discussed within the Built Heritage section of this report.
164. The proposals seek to make the optimal use of land within a sensitive location partially within the Fleet Street Conservation Area and within the setting of the Whitefriars and Temples Conservation Areas alongside numerous listed buildings and the Temple Registered Historic Park and Garden. 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 provision of providing additional student accommodation in an appropriate location in proximity to several Educational Institutions whilst retaining much of the host buildings. In this, the proposals would accord with Emerging City Plan Policy S22: Fleet Street and Ludgate; and London Plan Policies SD4 and SD6. It is also considered that the scheme would represent 'Good Growth' by design, in accordance with the Local Plan Good Growth Objectives GG1 – 6: growth which is socially, economically and environmentally inclusive.

Architecture

Northern Block:

Bulk, Height and Massing

165. The disposition of the final massing, bulk and overall expression of the northern block has been carefully considered in relation to key townscape views, with particular attention to views experienced from along Fleet Street and within the Fleet Street Conservation Area. These are discussed in further detail within the Heritage and Views section of this report.
166. The proposal would retain a significant proportion of the existing structure and as such the plan form of the northern block would follow the existing building lines. The greatest alterations to the bulk and massing come from the upward 2 storey extension increasing the height of the building from 33.8m AOD to 36.7m AOD. The existing fifth floor would be demolished, and three new upper floors would be constructed. The central lightwell of the building would remain, however, the lightwell to the rear of the Tipperary pub would be partially infilled.
167. The roof top extension would take the form of a double height mansard roof uniting the different facades of the building, whilst the uppermost part of the roof would be set back to reduce visual impacts and ensure subservience. The roof form would be slightly set forward or back with parapet walls included to accentuate the individuality of the plots and facades below. The roof extension would be recessed to retain the historic roof form of the frontage of the Grade II listed pub, to allow for this asset to be appreciated in its current standalone form.
168. The total increase in bulk and height of the northern building is considered to be moderate and maintain a commensurate scale with the surrounding townscape found along Fleet Street. It would have a recessive character in oblique views along Fleet Street and the roof extensions would appear proportionate to the levels below when viewed directly from closer viewpoints. The retention of the narrow widths of the facades reflects the wider historic character of plots along Fleet Street, which have developed over time in an organic, piecemeal manner.

Expression and Materiality

169. There has been a considered approach to the detailed design of the northern block, owing to its sensitive location on the southern side of Fleet Street. The character and expression of the block has been designed to respond to the variety of narrow fronted facades traditionally found along Fleet Street, with the facades of the Grade II Listed The Tipperary pub retained as existing with minor alterations associated with repairs.

170. The retained façade of No.63 Fleet Street, located on the junction with Bouverie Street, would largely be retained as existing with no changes proposed on the northern elevation. On the western elevation a secondary door would be replaced with a window to match the design of other elements of this facade's fenestration. The roof to this façade, which is non-original and associated with the 1988 redevelopment, would be demolished and replaced with a double height mansard roof extension. Dormer windows would be set within the roof, providing visual interest with the fenestration language referencing the crissall windows found on the façade below, and are considered to provide an appropriate termination to this façade that has a good traditional hierarchy.
171. The proposals involve the complete façade replacement of Nos.64 and 65 Fleet Street which sit at the centre of the northern elevation of the northern block. The existing post-modern design of the façade and granite materiality is somewhat at odds with the predominant traditional, classical style found elsewhere on Fleet Street. The new Portland stone façade would retain a shopfront window at the ground floor of No.64 providing activation and animation to the street, whilst the upper floors would include a regular rhythm of windows that run up to the double height mansard roof of the building. The materiality is considered to be more appropriate and complementary to its context within the Fleet Street Conservation Area.
172. The existing archway under No.65 which provides access to the southern block is presently a dark, uninviting space as a result of its lighting and materiality. As part of the proposals, the generous double height size of the opening would be retained but with a simplified geometry to provide an elevated experience and lighter / clearer route into the courtyard beyond. A new muted green faience would delineate the passageway in an expressive but simplified manner, providing a nod to the adjoining Tipperary and a subtle contrast to the natural stone elevation it would sit within. This would be accompanied by subtle lighting and signage. The materiality is considered to be high quality and durable, pertinent given its presence at ground floor level where the building is most closely interacted with.
173. Within the archway itself, new areas of glazing and entrances are included which will create a more outward facing and visually permeable space thus increasing activation and animation. On the eastern elevation of the passageway, new public art with references to the Whitefriars Crypt will provide further additional visual interest with details of this to be secured by condition. The main entrance to the student accommodation element on the upper floors of the northern block would be provided on the western side of the passageway alongside new windows into the ground floor retail unit on the north western corner. The cycle parking entrance would also be provided in this space. The area would also be available for patrons of The Tipperary pub to use as a covered external space. Overall, Officers consider

the changes that inject moments of playful vibrancy and animation into the passageway of the building which is currently hostile, dark and unwelcoming to be beneficial and are welcomed. Final details of these works, including materials and shopfront designs, would be secured via way of condition.

174. On the upper floors above the archway, new slimer windows and a vertical focus of the architectural articulation help demarcate the archway located below and give a sense of elegance to the robust materiality of the building. A Portland stone coping would be located above the third floor of No.64 / 65 which will link onto the datum of the existing retained façade of No.63. At fourth floor level, the fenestration language of this element of the building would change to give a more recessive and subordinate appearance to the top of the building.
175. As with No.63, the existing roofs of No.64 / 65 would be demolished and replaced with a new double height mansard with slimline dormers to reflect the fenestration pattern below. There would be variation in the roofline to reflect the variation between the two façades below, with a change in the roof line resulting in the roof of No.64 sitting slightly below that of No.65 to reflect its more subordinate nature. Furthermore, a darker green slate tile would be used on No.65 with a paler green slate tile on No.64 alongside a raised stone parapet delineating the two elements. Full details of the dormers and roof materiality would be secured via way of condition.
176. With regard to the Grade II Listed Tipperary pub at No.66 Fleet Street, the façade will be retained as existing with no significant changes proposed. The upper floor windows would be refurbished on a like-for-like basis with the original roof retained in situ. A single storey mansard roof extension would be setback from the building line and the original pitched roof at the front of the pub, clad in traditional clay heritage roof tiles with two smaller dormers to match the modest nature of this façade. The internal works are detailed within the Built Heritage section of this report.
177. The final element forming the northern elevation of the northern block comprises the retained façade of No.67 Fleet Street. The roof including the existing dormers to this elevation would be demolished, and an additional storey clad in Portland stone to match the existing would be added above the existing datum. At roof level, this element would also benefit from a part single storey, part double storey mansard roof extension – with the double storey mansard located on the eastern elevation. The single storey element would adjoin the Tipperary pub, thus the single element reduces visual discordance. The ground floor would retain its active frontage, providing animation on this busy street corner on Fleet Street and down along Whitefriars Street. The lower dormers would take reference from the existing dormers of the building, whilst the upper windows would be flush with the roof plane to ensure subservience.

178. The southern elevation of the northern block facing onto the courtyard would be subject to an entire façade replacement, with the existing postmodern design associated with the 1980s YRM scheme reimagined with the same design principles as those found on the northern elevation of Nos.64/65, continuing the same architectural language through the archway and into the public space and providing a cohesive connection to the architectural language of the southern block it sits opposite too.
179. Granite reclaimed from the existing façade system of the building would be used to delineate the base of the building, providing a high quality and sustainable materiality to the element of the building that is experienced at ground level. The archway would be finished in a muted green faience to match the appearance found on the northern elevation, with a simplified geometry. The active frontage on the southern eastern corner would be retained, providing animation. However, the active frontage on the south western corner would be removed in order to accommodate a new blue badge parking bay. Whilst the loss of this activation is suboptimal, given the animation provided by the active frontage opposite on the southern block and the provision of infrastructure to support inclusive access at the site this is considered to be acceptable.
180. At middle, the fenestration pattern of the building would be retained, with new clear glazing replacing the postmodern pastiche crittall windows. The façade would be replaced, with a new GRC finish in a Portland stone style which provide a lighter materiality to the courtyard which is a shaded space and the existing dark granite materiality presently accentuates this darkness. The use of GRC in a Portland stone is considered to be acceptable owing to its locations at the upper floors, whilst its finish would reflect the predominant Portland stone materiality of the Fleet Street Conservation Area.
181. Metal railings would be installed onto the structure to provide visual interest and depth to the building above the archway, to further delineate this feature below improving legibility and acting as a focal point to this elevation. The roof form would take a double mansard roof to match that found on the northern elevation, punched with dormers to provide further visual interest and provide hierarchy. The additional storey set back at the top of the building would ensure a recessive and subordinate appearance, and ensures no further enclosure of the courtyard which is already an enclosed, shaded space.
182. In terms of the ground floor units, 3 smaller retail units on the western side of the northern block facing onto Fleet Street and Bouverie Street would be amalgamated into one larger unit. This is proposed to make the unit more viable, whilst part of the retail unit facing onto Bouverie Street would be lost

to the inclusion of the blue badge bay for the student accommodation. Nonetheless, the merging of the units would allow for the retention of the rest of the active frontage on Bouverie Street and Fleet Street whilst introducing new areas of active frontage within the covered passageway which is presently inactive.

183. Furthermore, a new connection would be made between the Tipperary and the adjoining ground floor unit of No.67 facing onto Whitefriars Street. This would enable a new dining area to help sustain the operation of the listed pub, which would retain its historic bar and whiskey bar in the existing footprint.
184. The roof of the building has been designed to integrate a bisolar and brown roof, with a green roof on the lift core. There would be no additional accretions on the roof form of this block, ensuring there would be no additional visual impacts from views along Fleet Street. As the roofscape would be visible from surrounding taller buildings, further details will be conditioned to ensure that the roofscape is of a high quality.

Southern Block:

Bulk, Height and Massing

185. The height, massing and overall expression of the development has been carefully considered in relation to key townscape views, with particular attention to views experience from within the Temples Conservation Area and from the River Thames. These are discussed in the following section of the report.
186. The proposal would retain a significant proportion of the existing structure of the southern block, and as such as the building's plan form would predominantly follow the existing building lines. The greatest alterations to bulk and massing come from the upward extension at Level 06, which will see an additional 4 storeys plus plant taking the height of the building to 55.465m AOD, following the demolition of the top storey and plant of the existing building.
187. The appropriateness of extending the existing southern building at the site with additional bulk, height and massing was analysed under planning permissions 19/00058/FULMAJ (subject to amendments via Section 73 application 21/00709/FULMAJ) based on a rigorous assessment of views and impacts on surrounding heritage assets. The principle of additional height on the southern block was considered to be acceptable. However, the proposals subject to this application present a slight level of additional height and this is assessed below. Whilst the subject proposals contain a number of extra floors than the previously consented office accommodation

scheme, this has been accommodated in a broadly similar height envelope as a result of the lower floor to ceiling heights required by student accommodation.

188. At a macro level, the City steps down in building scale from Holborn towards the river and the proposed extensions to the existing southern building would integrate into this traditional historic urban layering as experienced from the South Bank and river bridges. At a local level, the proposals would have limited visibility owing to the narrow nature of the streets. This would mitigate the impacts of the proposal, however, the stepping back at each level of the roof extension would further reduce the impact in glimpsed views from the immediate surrounds.
189. To help reduce the visual impact of the proposals, a number of design interventions have been made. The roof extension would be set back progressively at each floor as you move up the building at levels 08 – 10, ensuring it appears recessive. Furthermore, a gradation of green tones to the PPC cladding would lighten towards the top of the building further ensuring subservience. This green metallic finish would provide a crown to the building, particularly in longer views from the Temples, South Bank and bridges across the Thames.
190. In addition, the proposals incorporate features to further articulate and break down the bulk and massing of the extension. The existing setbacks which break down the existing façade would be carried up to the top of the building, breaking down the massing and reducing the horizontality of the proposals. In addition, the fluted nature of the façade system with its expressed coping would provide visual interest and would extenuate shadows providing depth. The corners of the roof extension would be softened to reduce its impacts. Planting would be incorporated onto the roof terrace to provide a softer termination to the building, whilst there would be a glazed balustrade over 2m high to ensure student safety in line with the aspirations of the City of London Suicide Prevention Planning Guidance.
191. Amendments were secured following the planning submission which have seen a reduction in the bulk and massing of the upper extension of the southern block. The student rooms proposed on the tenth floor have been removed, to deduct a significant amount of bulk and massing of this storey in order to reduce impacts on surrounding heritage assets - particularly the Temples Conservation Area and the listed buildings along Kings Bench Walk. As a result, Level 10 now only proposes to provide access to an external amenity terrace as well as containing some plant, requiring a smaller scale extension at this level.
192. As a result of the retention of the main body of the building, limited interventions have been proposed for the bulk and massing of the base and

middle of the building. The most substantial intervention at base incorporates the extension of the building over the rear lightwell on Ashentree Court to provide more circulation space for the Whitefriars Crypt.

193. The extension around the Whitefriars Crypt would take a single storey form, with reclaimed granite from the existing building facing the walls including articulation from reclaimed textured granite. The extension would feel lightweight with large amounts of glazing to allow passersby to look into the crypt, with CLT flitch piers. This modest extension is considered to be of an appropriate scale to the intimate alley it would sit within, sitting comfortably within its context.
194. Visual impacts are further mitigated by the facade detailing and the introduction of different colour tones through the façade – discussed in detail in the following section.

Expression and Materiality

195. Whilst as a result of the retention of the main body of the building meaning that limited articulation interventions could be achieved to help break down its bulk and massing, there has been a considered approach to the design detail of the proposals.
196. Owing to the buildings location in the context of several designated heritage assets, including three Conservation Areas, the character and expression of the building has been designed to help mitigate its visual impacts whilst having a good level of articulation and visual interest through its fenestration and materiality. The building has been given a clear base, middle and top as set out below.

Base:

197. The base of the building would be clearly defined with the use of reclaimed dark grey granite which would be re-used from the existing façade ensuring a sense of robustness to the structure. This would cover the ground floor and lower ground floor, covering two storeys at the south of the building owing to the level change across the site. The existing lightwells would be retained, with the metal railings with an anodic finish to match the fenestration of the building. This would provide depth to the base and visual interest along Whitefriars Street and Bouverie Street. Visual interest would be provided with the set back breaks in the façade retained, and reclad in textured PPC metal cladding in a dark green finish which would rise up the building to the crown. This would break down the façade into three bays along Bouverie Street and Whitefriars Street, and two bays on the northern elevation.

198. The main entrance to the cultural element of the development would be centered on the northern elevation, in the place of the existing entrance, facing onto the central courtyard. This would provide level access to the cultural space, ensuring inclusivity to all, whilst the northern eastern section of the building would accommodate a reception space for the cultural occupier and an exhibition space. A secondary entrance to the student accommodation element of the scheme would also be located on this elevation, providing further activation.
199. The main entrance to the student accommodation would be located on the western elevation of the building, facing onto Bouverie Street and accessed via a small bridge link across the existing lightwell. This would provide new activation and animation to this frontage which presently does not benefit from much activity.
200. To the south of the building, a new entrance for the Whitefriars Crypt would provide new active frontage on this presently underutilised and uncelebrated space. The simple design of the new single storey extension around the Crypt with timber piers would enliven the base of the building in this location, whilst respecting the sensitive heritage asset it would surround. Full details of the final design, materiality, signage and lighting would be secured via condition.
201. The existing service bay would be retained in its current position in the south east of the site, facing onto Whitefriars Street. No significant design changes are proposed for this element.
202. The proposed ground floor elevations would see an increase in the amount of outward facing and visually permeable frontage around the site, allowing passers-by to look into the new cultural spaces and reception areas. Overall, officers consider that the proposals adaptations to the ground floors would provide greater animation and enhance the quality of the central courtyard, surrounding streets and alleyways and significantly improve the design quality of the base of the building. A condition would be applied to the application to ensure glazing remains clear and transparent to enable views into the public elements of the base of the building.

Middle:

203. Each elevation of the building would follow the same design principles as each other and are broken down into bays, with the existing setback breaks retained. The bays would be finished in a GRC with a Portland stone style textured finish which lighten the building, and appear more complementary to the architecture of the surrounding conservation areas. The setback breaks would be finished in a dark green metallic finish, which would provide a striking contrast to the light GRC thus breaking down the monotony of the existing building extensive elevations further. These setbacks would rise up

to the crown of the building. New horizontal bands would run around the building with a ribbed textured finish providing additional articulation and depth to the façade which is presently very flat. The datums would be thicker at each shoulder height datum where the building sets back slightly at Levels 03, 04 and 07.

204. A new fenestration pattern would be added to the façade with a regular rhythm of new larger openings, with integrated ventilation side panels providing natural ventilation without endangering student safety. The window has been designed to maximise natural light, yet prevent overheating. The windows would be within a metal frame, with darker finish to the lower floors and a lighter finish to the main body to fit more comfortably within the wider materiality. The upper three storeys of the middle of the building would see a variation in the fenestration with an increase in slimer windows giving a more recessive and subordinate appearance to the top of the building.
205. The existing metal framed balcony structures which are unusable and cover most of the building would be removed, leaving a simpler façade without overly fussy detailing allowing the new façade to speak more strongly. Decorative metal railings would be retained on levels 2 – 4 on the western and eastern elevations to provide some depth, articulation and finish to these elevations. These would be finished in an anodised finish to match the fenestration language. Final details would be secured via way of condition.

Top:

206. The crown of the building would differentiate from the main body of the building through the use of a lightweight materiality to provide a more recessive appearance that contrasts with the robust main body below. The proposed use of metal cladding with a dark green colouration would link in with the setback breaks in the façade below providing a visual link between the main body and the crown. The colouration of the metal cladding would lighten from a dark green to a paler green gradually from Level 08 to 10, to further enhance the sense of subordination.
207. The cladding would be fluted to provide texture and depth that creates playful shadows, with coping at each parapet to ensure strong datums to terminate the building. The fluting includes a bird mouth at each junction to soften the corners of the building, whilst the PPC finished would be textured to provide further depth. The use of the green colour would be reflected with green frames to the fenestration to match the gradation of colours as you move up the building. This will particularly help crown the building in long views from The Temples and the South Bank, where it would integrate more comfortably in the wider roofscape which includes numerous copper crowned buildings.

208. The fenestration of the crown would further differentiate to the main body to give this element of the building a more subordinate, attics treatment. The crown of the building incorporates the plant with metal louvers screening equipment, ensuring a well-integrated and seamless finish in long views of the development.
209. Finally, the top of the building has been designed to incorporate a landscaped amenity terrace for the use of the students with glazed balustrading integrated into the design to ensure their safety. These balustrades would be set within from the buildings edge to ensure visual impacts are reduced. The balustrades would be 2.1m in height to ensure it accords with the City of London Suicide Prevention Guidance. On top of the lift and service, a biodiverse green roof would be incorporated into the design alongside the brown roofs located on the setback levels below as well as around the Level 10 amenity terrace. Further details of this element of the proposal are to be secured by way of condition.

Other Matters:

210. 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.
211. 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 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.
212. A high-quality signage and wayfinding strategy for the proposal would be required and would be secured via condition.
213. Officers acknowledge the concerns raised by the City of London Conservation Area Advisory Committee in relation to the use of GRC as one of the materials on the southern block. The material is already found throughout the City, and the elements of the scheme which contain this material are not within an Conservation Area. Furthermore, GRC would be limited to parts of the façade that are not experienced or interacted with at

street level – all located at first floor level and above – with reused marble from the existing building at ground floor level. Conditions have been attached requiring details and samples of all external materials to be used on the scheme to ensure they are robust and high quality, including sample panels at a scale of 1:1.

Urban Design and Public Realm

214. The layout of the ground floor of the Northern block of the site would largely retain the existing active frontage and different uses contributing to the variety of activity found along Fleet Street and contributing to its role as a Principal Shopping Centre as designated within the emerging Local Plan Policy RE1. The retention of these existing active frontages, alongside the addition of new further areas of animation to both the northern and southern blocks would help generate additional activity at ground floor level, positively stitching the site into the wider urban grain. The improvements to the public space would contribute to an urban structure characteristic of the city, with streets, courts and public spaces which are welcoming, convenient to use and attractive. The proposals present compliance with London Plan Policy D3 and Local Plan Policies CS10, DM10.1 and DM10.4, by offering spaces that positively respond to the character, distinctiveness, scale and appearance of the City's Public Realm.
215. The existing courtyard which dissects the two blocks is of a poor quality, with no soft landscaping and is not presently open to public use with limited step free access. The space does not afford itself to encourage activity and vibrancy, with a sparse, harsh and dark environment. The proposals are considered to improve these conditions insofar as possible.
216. Within the proposals the public space would be refreshed with new areas of seating and soft landscaping provided with new York stone surfaces to provide a consistent language that aligns with the rest of the City's public spaces. The re-invigorated courtyard has been designed to become a new dwell space, providing a quieter and intimate space away from the hustle and bustle of Fleet Street. The space will form part of a new network of spaces and passageways which will run between the site and the St Brides institute through the new court development with enhanced wayfinding and greening. In addition, the changes to the public courtyard will see the inclusion of new step free access between the space and Whitefriars Street to the north via the inclusion of a new platform lift. The existing gates would be removed to allow for clear public access at all times, increasing the sense of publicness and openness of the space for all to use. Overall, 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.

217. In addition to the retained active frontages on the northern elevation, the secondary frontages of the northern block facing onto Bouverie Street and Whitefriars Street would be retained as existing. Within the archway between Fleet Street and the courtyard, new areas of glazing and entrances would be provided resulting in furthering activation and animation.
218. The existing main entrance of the southern block, facing onto the courtyard, would be reused as a new entrance to the cultural spaces found at Lower Ground Floor level. An additional secondary entrance would be provided for the student accommodation on the northern elevation, whilst the main entrance to the student accommodation reception would be provided via a new entrance on Bouverie Street providing new activation on this elevation. In addition, new activation would be provided on the southern elevation within Ashentree Court to provide new public access to the Whitefriars Crypt. This would result in a significant betterment to the existing situation, where this alleyway has no animation at present.
219. 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 that align with the nature of Fleet Street as an important thoroughfare and place of commerce within the City. The provision of retail units on the Fleet Street elevation of the northern block alongside a two new entrances for the cultural uses in addition to the student accommodation reception on the southern block would promote activity at different times of the 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.
220. An appropriate management of the public realm would be ensured via a Public Realm Management Plan. This 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.
221. 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 public space 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 Local Plan Policies CS10, DM10.1 and DM10.4.

222. The proposed materials would be robust and high quality, with the final details of surface materials and specification of street furniture to be 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. This would be a betterment to the existing poor quality confusing mix of paving found in the existing space. 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 would have a coordinated design aesthetic and overall the proposals are considered to be acceptable.
223. 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 Public London Charter.

Outdoor Amenity Space and Landscaping Design

224. Two different outdoor amenity spaces are proposed at 65 Fleet Street, with the primary communal amenity space for students located at Roof Level 10, with an additional secondary amenity space located within the Lower Ground lightwell of the public courtyard for the use of the cultural tenant.
225. The Level 10 Roof Terrace would be accessed from the central stair and lift core and would provide an elevated terrace with views over Central London for the use of students. The space would incorporate planters, pergolas, fixed and unfixed furniture to provide a range of flexible spaces while ensuring inclusivity and safety. Both a mix of sociable spaces with raised seating for group gatherings as well as quieter, intimate spaces for activities such as studying would be provided. The glazed balustrade of the terrace would be 2.1 metres in height and set back from the building line in line with the City of London Corporation Preventing Suicides in High Rise Buildings and Structures planning advice note. Further detail regarding suicide prevention, inclusivity and landscaping would be secured via condition.
226. The Lower Ground amenity space would provide a breakout space for the use of the Lower Ground tenants with a central specimen tree to provide

amenity and a mix of fixed and unfixed furniture. The soft landscaping for this element would be of a shade tolerant mix better suited to this shaded location. Further detail of landscape design including inclusive design would be secured via condition.

227. In addition to the accessible amenity spaces, the proposals also incorporate brown roofs seeded with a wildflower mix at Levels 00 within the central lightwell and at Roof Levels 07 of the northern block and Roof Levels 08, 10 and 11 of the southern block. A green roof would be provided atop of the lift overruns. Climbers have not been incorporated on to any of the structure in line with fire regulation requirements for residential accommodation. The inclusion of these additional planted areas are considered to be significant betterment to the existing situation at the site.
228. Notwithstanding the approved drawings, the final details of the landscaping including full planting specifications, hard and soft materials, furniture, maintenance regime and irrigation, in accordance with the City of London Technical Toolkit, will be conditioned to ensure that the design and materials are of a high quality, so the landscape thrives and is of acceptable design quality and is full inclusive.
229. Appropriate lighting, in accordance with Local Plan Policy DM10.1, would deliver a sensitive and coordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City at night. Irrespective of the approved drawings, a detailed lighting strategy would be subject to condition to ensure final detail, including form, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with the guidance set out within the City of London Lighting Strategy.

Conclusion on Architecture and Urban Design

230. Officers consider that the architectural design of the proposals would be compatible with the existing context in terms of scale, architectural articulation and massing. The proposals are considered to result in a well layered piece of design that would improve the buildings contribution to the local townscape. The ground floors of the building would become more outward facing with new areas of active frontage, particularly on the southern elevation and within the arched passageway under the northern block. Similarly, the proposals would unlock for the Whitefriars Crypt for better public viewing as well as enhancing the landscaping within the site, providing richer planting and new opportunities for siting within the courtyard which would be reopened for public access. The proposals optimise the use of land, whilst improve the buildings interface with their surroundings.

231. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises site capacity to accommodate a student accommodation development alongside ground floor retail, food & beverage and cultural uses which would contribute to the Destination City objectives and support the regeneration of Fleet Street. The proposals are considered to be in accordance with Emerging City Plan Policy S22; and London Plan Policies SD4 and SD6.
232. 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, S22 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.
233. Irrespective of the approved drawings, full details of the 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 Mayor's Public London Charter promoting a safe, inclusive and welcoming environment.
234. A high-quality signage strategy for the proposal would be required and would be secured via condition.

Heritage & Strategic Views

Policy Context

235. The relevant Adopted Local Plan (2015) policies for consideration are CS12, DM12.1, DM12.2, DM12.3, DM12.5 and CS13; emerging City Plan 2040 policies S11, HE1 and S13; and London Plan (2021) policies HC1, HC2, HC3, HC4 and HC5. This is in addition to the relevant sections of the National Planning Policy Framework as well as the London View Management Framework and other relevant supplementary planning guidance including the City's Protected Views SPD.

Strategic Views

236. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. These policies seek to implement the Mayor's London View Management Framework (LVMF) SPG (the SPG), protect and

enhance views of historic City Landmarks and Skyline Features and secure an appropriate setting and backdrop to the Tower of London.

237. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents. This has been supplemented by additional imagery during the planning application's assessment.
238. For clarity, the application site is located in the west of the City, at considerable distance from the World Heritage Site. Intervisibility between the two has been tested in the TVIA, confirming that the proposal would have no visual relationship with and would therefore have no impact upon the World Heritage Site.

Tower of London World Heritage Site

239. The site is not located within the Local Setting of the Tower of London and the proposal would share no intervisibility with the World Heritage Site in any of the Representative Views identified in the LVMF or the Local Setting Study.

London View Management Framework (LVMF) Impacts

240. The LVMF designates pan-London strategic views deemed to contribute to the Capital's character and identity at a strategic level. Those relevant strategic views where there would be a material impact are addressed here against London Plan Policy HC4 and associated guidance in the SPG.
241. The site falls outside of Protected Vistas in the LVMF and due to the relative low height would only appear in a few of the River Prospects, assessed below

LVMF 12A.1: Southwark Bridge: The Upstream Pavement

242. St Paul's Cathedral is the sole SIL, whilst other landmarks include Millennium Bridge and St Bride's Church in a broad riparian composition.
243. This view is located at the centre of Southwark Bridge and upstream and is dominated by St Paul's Cathedral. The visual management guidance paragraph 209 describes the broad expanse of the River dominated by the Cathedral. St Bride's Church is identified in the view and is referred to in paragraph 210 of the LVMF SPG as part of the layering of history in the view. Referring to HTVIA View 11, the proposed development would be positioned well to the right of Unilever House and, in the baseline scenario, would largely be occluded by 8 Salisbury Square and the emerging Police Headquarters at Salisbury Square any visibility would be limited to the

uppermost southern corner. As such, the proposal would be embedded with the established and recessive midrise buildings stepping down to the river.

244. In cumulative scenarios there would be no change to the impact of the proposed development on the composition of this view.
245. In accordance with the guidance, the limited visual presence of the proposal in baseline and cumulative scenarios would not harm the viewer's ability to recognise and appreciate the Cathedral or dominate it. The proposal would not obscure or detract from a contributing landmark or features and the distinctive vertical presence of St Bride's steeple would be unchallenged. The proposals would accord with the SPG paras 211-213.
246. LVMF view 12A.2 is orientated southwest, and the proposal would have no additional impact.
247. Overall, the proposal would not harm the characteristics and composition of the strategic view and its landmark elements, including preserving the ability to recognise and appreciate St Paul's as the SIL.

LVMF 15 B.1 - 15B.2: Waterloo Bridge: The Downstream Pavement

248. LVMF 15B comprises two Assessment Points, 15B.1 and 15B.2 and the kinetic experience between them. It is an iconic London view with important views east towards St Paul's Cathedral and the City of London. St Paul's Cathedral is identified as the Strategically Important Landmark in this kinetic and iconic view in daytime and night-time. The visual management guidance paragraph 259 describes the broad expanse of the River how the eye is drawn towards Temple Gardens, St Paul's Cathedral and the City cluster. St Bride's Church (grade I), Old Bailey (grade II*) and the Barbican Towers (grade II) and Temple Gardens are identified in the view as recognisable buildings and elements on the skyline in the LVMF SPG.
249. There would be no impact on the ability to appreciate St Paul's Cathedral due to the distance from the site and overall the development would comply with the Visual Management Guidance set out in paragraphs 262-265 of the LVMF SPG.
250. In assessing the baseline impacts of the development to 15B.1 and 15B.2 (HTVIA Views 16 and 17) these are a kinetic viewing experience from this River Prospect, the development would be visible to the near left hand side and as part of the urban layering set back from the river frontage. In the baseline scenario, the proposals would be backdropped by the emerging Salisbury Square Development including the Police Building and Commercial Building.

251. From 15B.1 the development is largely occluded by intervening development and the verdant linear Temple Gardens and Victoria Embankment. The faceted metallic gradations of green to the crown of the southern elevation would be visible and part of the pale masonry body of the building below. The development where seen would blend with the layering, scale, colour and materiality of existing midrise developments which characterise development along this river fringe. St Bride's Church spire is prominent at this assessment point as an historic and recognisable although, in the baseline scenario, the lowest storey is concealed by the emerging Police Headquarters at Salisbury Square and backdropped by City Point, making the experience of the spire in this view not pristine and the spire is enclosed by urban layers. Under the baseline scenario, the south eastern upper two storeys of the proposed development would entirely conceal the arcaded arches of the lowest tier and there would be an additional densification of development around the spire. From this static assessment point there would be an erosion of the ability to appreciate this Wren spire within the view.
252. Moving from 15B.1 to 15 B.2, the development would move away from the spire and reveal the lowest tier. This is a dynamic skyline and in the baseline the aforementioned emerging Salisbury Square Development backdrops the proposal site and at 15B.2 partially obscures the Dome of Old Bailey, slightly erodes St Bride Church and occludes parts of the Barbican Towers (Cromwell and Shakespeare Tower). From 15B.2 the proposal would result in no further impacts on St Bride Church or Dome of Old Bailey; the clear sky silhouette of St Bride would be preserved and the gilded Lady Justice and stone lantern would remain visible. The relatively low scale, linear articulated roof form and colouration of the development would complement and preserve the Temple Gardens and its verdant softness rippling along the Embankment would continue to dominate the foreground. Equally whilst the development would encroach on the lower storeys of the Barbican Towers (Lauderdale Tower) at 15B.2 the striking silhouette on the skyline and ability to appreciate the landmark status as a cluster of tall buildings would be preserved.
253. In cumulative scenarios the approved developments of 120 Fleet Street and Hill House would step up in the background and the former would more significantly occlude the Barbican Towers at 15B.2. There would be no change to the impacts on St Bride's Church, Dome of Old Bailey or Temple Gardens.
254. The proposed development in baseline and cumulative scenarios would preserve the existing setting of St Paul's Cathedral as the Strategically Important Landmark.

255. In baseline and cumulative scenarios, the proposal's impacts on St Bride Church spire would result in some limited conflict with Policy HC4 (A), and SPD para 72 harming the contribution of this landmark element of the view in the baseline scenario. Otherwise, the proposal would preserve the setting of the Cathedral as the Strategically Important Landmark and other identified landmark elements and the juxtaposition between them, and there would be no harm to the characteristics or composition of the view in accordance with LVMF SPG guidance paras 73, 305. Historic England identifies harm to St Bride Church in this view and discussed, further in the indirect impacts to listed buildings section.
256. Further consideration of the impact of the proposal on Temple Gardens, Old Bailey and Barbican Towers is given in the Heritage section of the report below.

View 16 (16B.1- 16B.2), River Prospect, The South Bank: Gabriel's Wharf Viewing Platform (HTVIA View 14)

257. These two assessment points are located together on the viewing platform and St Paul's Cathedral is identified as the sole SIL, whilst other relevant elements are St Bride's Church and Temple Gardens.
258. The visual management guidance describes the dominance of the River in the foreground, with those buildings on the north side providing a rich and intricate skyline. Reference is made to the subtle transition of scale between the Temples and the more recent commercial development on Fleet Street/Ludgate. Sited at some distance from the Cathedral in this view, and clearly belonging to the established midrise Fleet Street skyline including the Salisbury Square development. The uppermost storeys of the fluted soft green metallic roof would rise unobtrusively above the tree lined river frontage preserving the townscape setting of the Cathedral in accordance with paragraph 280. At some distance from the Cathedral the development would preserve the ability to recognise and appreciate the SIL, which would remain the pre-eminent focus. Nestling into the middle ground skyline other historic buildings and landmarks within the composition would also be preserved, all in accordance with paragraph 282 of the SPG.
259. In cumulative scenarios the expanded New Street Square including Hill House and 120 Fleet Street would back drop the development and 65 Fleet Street would be pivotal in gently transitioning the scale from these taller buildings to Temple Gardens and the River.
260. It is considered in baseline and cumulative scenarios that the proposal would preserve the pre-eminence of the open prospect over the river and skyline presence of the Temples and other Victorian/Edwardian buildings defining the Victoria Embankment. The proposal would preserve the ability

to recognise and appreciate St Paul's as the SIL, which would remain the pre-eminent focus, its townscape presence preserved in accordance with paragraphs 280-283 of the LVMF SPG.

261. Overall, the proposal would not harm the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL and Temples in accordance with paras 68-70 of the SPG.

LVMF 17B.2 and 17B.1: Golden Jubilee/Hungerford Bridge – crossing the Westminster Bank (HTVIA View 18)

262. The footbridge provides a kinetic enhanced viewing experience from and between two assessment points 17B.1 and 17 B.2 eastwards towards the City of London. St Paul's Cathedral is the Strategically Important Landmark, St Bride's Church (I) is also highlighted as a landmark with the Dome of Old Bailey (II*) and the Barbican Towers (II) amongst others are also identified within the view.
263. The SPG describes the River as defining the foreground and middle ground, enlivened by Waterloo Bridge and the Embankment trees creating a significant sense of horizontality. It identifies St Paul's as rising above the general townscape, including the City Cluster off to the right, while the spire of St Bride's and the dome of Old Bailey are identified as distinctive vertical elements seen against sky as are the Barbican's trio of towers. On the urban skyline St Brides currently has a clear sky backdrop in these views; the Barbican Towers and Old Bailey are experienced within urban layers of foreground and background development.
264. In baselines scenarios from 17B.1 and 17B.2 (HTVIA 18 and 19) and between these assessment points the development would appear to the left, projecting slightly above the dominant horizontality of the verdant trees along the Embankment but would be some distance from St Paul's Cathedral nestling unobtrusively within the characteristic Fleet Street midrise skyline. The fluted soft green linear roof form and upper storeys of the pale masonry southern and western facades would rise above tree-lined river frontage stepping down in scale from the under-construction Salisbury Square Development.
265. From 17B.1 close to the Victoria Embankment, the Salisbury Square Development will conceal the lower half of Cromwell Tower, one of the Barbican Towers, part of the Dome of Old Bailey and the lowest tier of St Bride's spire. The proposed development would be in the foreground shadow of this taller development and there would be no worsening of the impacts to St Bride Church or the stone lantern and gilded statue of Old

Bailey although there would be an almost indiscernible encroachment on the base of Shakespeare Tower (the central Barbican Tower).

266. Moving towards 17B.2, the midpoint of the Bridge, the development would further conceal the bases of the Barbican Towers including Shakespeare and Lauderdale Tower. However, the robust silhouette of these landmarks would overall remain largely revealed and overall preserved thus retaining the ability to readily appreciate and recognise these distinct skyline features. There would be no further impacts on other landmarks from this assessment point.
267. If cumulative impacts are considered including the approved development of 120 Fleet Street and Hill House these would be visually prominent additions to the skyline. Through the kinetic sequence these would backdrop the development site and densify development around St Brides spire, Dome of Old Bailey and further conceal the Barbican Towers in a more impactful manner than the proposed development.
268. In baseline and cumulative scenarios, the proposals would comply with Policy HC4 (A), and the guidance in the SPG and would preserve the setting of the Cathedral as the Strategically Important Landmark and other identified landmark elements and the juxtaposition between them, and there would be no harm to the characteristics or composition of the view in accordance with LVMF SPG guidance paras 73 and 305.
269. Further consideration of the impact on the heritage assets of St Bride Church, Temple Gardens, Old Bailey and Barbican Towers is given in the Heritage section of the report below.
270. The development would preserve the setting of St Paul's as the Strategically Important Landmark. In baseline line scenarios in relation to LVMF 15 B.1 there would be some concealment of the lowest tier of St Bride Church spire and to a lesser extent there
271. In all other scenarios the proposal would preserve the characteristics and composition of relevant strategic views and their landmark elements. It would preserve the viewer's ability to recognise and appreciate St Paul's Cathedral as the relevant Strategically Important Landmark.

Summary of impacts on LVMF Strategic Views

272. On balance due to the identified impacts the baseline and cumulative proposals would conflict to a small degree with Local Plan Policy CS 13(1), draft City Plan 2040 Policy S13 and London Plan 2021 policy HC4 and guidance contained in the LVMF SPG.

City of London Strategic Views

273. The City of London Protected Views SPD provides guidance on the St Pauls Heights code, relevant (LVMF) Strategic Views, views from and to the Monument, views to and from the Tower of London World Heritage Site and views of historic City landmarks and skyline features. The site is not located within St Pauls Heights Policy Area, the Monument Views Policy area or the Local Setting of the Tower of London. The SPD identifies Historic City Landmarks and Skyline Features which includes St Brides Church as a “City Church with a Skyline Presence” and Old Bailey and Barbican Towers are recognisable landmarks. The SPD is supported by Local Plan Policy CS 13(1), draft City Plan 2040 Policy S13 and London Plan 2021 policy HC3 and guidance contained in the LVMF SPG. St Paul’s Cathedral and the Processional Route.
274. The impact on St Pauls Cathedral and its setting is identified in the SPD Protected Views are assessed in detail in the LVMF and also under Indirect Impacts to Listed Buildings.

The Monument

275. The Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City. The proposal is not in the defined Immediate Setting of the Monument and would have no impact on those identified views of/approaches to the Monument as identified in the Protected Views SPD.

Views from the Monument:

273. The proposal would be outside the field of view scope of all the Monument Views except for View 5.

View 5: North West to St Paul’s Cathedral

274. From here St Paul’s and St Bride’s Church are identified as the key features. The uppermost part of the southern block of the development would be partially glimpsed in these views and would be visually unobtrusive neither concealing or detracting from existing skyline features. As a composition, it is considered that the proposals would accord with paragraphs 4.3 of the Protected Views SPD, in that the proposal would not obstruct it, nor would it detract from the general open prospect and those landmark elements as a result of appropriate bulk and massing.
275. Overall, officers consider the proposed development would protect this significant local view from the Monument, in accordance with Local Plan

Policy CS 13 and emerging City Plan Policy S13 and guidance contained in the Protected Views SPD.

St Paul's Heights & Viewing Points

276. The site is situated some distance west of St. Paul's Cathedral, and there would be no direct intervisibility between the development site other than along Fleet Street. The proposal would not be visible and would be out of scope of most of the identified Viewing Points of St Paul's identified in the Protected Views SPD (Figure 3) other than those identified below.
277. The northern block of the development would positively frame this part of the processional route preserving the pre-eminence of the Cathedral within the kinetic experience. The retention of Nos 63, 67, The Tipperary and the infill building all extended in a traditional manner including mansard roof forms and application of contextual materiality of masonry and slate would blend the remodelled block seamlessly into the characteristic southern townscape of Fleet Street.
278. The upper storeys of the southern block would be glimpsed in the kinetic riparian sequences along the south bank in those orientated towards the Cathedral between Hungerford Bridge and Blackfriars Bridge most noticeably from outside the National Theatre but with no intervisibility with the Cathedral. In these experiences the linear development would nestle within the mid-rise developments south of Fleet Street rising unobtrusively above the Embankment and Temple Gardens and historic buildings fronting the river. The materiality of the pale masonry and tonal green articulated roof would complement the context of both buildings and established greenery (see HTVIA Views 13, 14 and 15).
279. Exceptional public views of London are afforded from the Golden Gallery and Stone Gallery of St. Paul's. Looking westwards from the viewing platform the development would largely be screened by the Salisbury Square development. Where part of the uppermost storeys of the southern block would be revealed projecting above the Commercial Building the articulated green roof would be an unobtrusive addition on the skyline. There would be no harm to the appearance and design of rooves as experienced from the Golden Gallery and Stone Gallery.
280. The development would not be visible from Watling Street, St Johns Street, Amwell Street, Farringdon Road, Cheapside and Cannon Street/ New Change junction.
281. The development would comply with Local Plan Policy CS 13(1), draft City Plan 2040 Policy S13 and the Protected Views SPD.

Views from other publicly accessible elevated viewing areas

282. With regard to 120 Fleet Street (LPA Refs: 21/00538/FULEIA and 23/01371/NMA), the approved public roof terraces on the roof of the Daily Express Building will provide mid-range 180 degree with visibility towards the south, west and east including of the Cathedral, St Brides Church and the New Court Building and the taller distant buildings in Southwark including the Shard. The location of the development site towards the west and set back height would be glimpsed on the skyline but would largely be screened by The Court Building and the Police Headquarters. The proposal would not interrupt obscure key landmarks nor the quality of the visual experience.

Other Borough Strategic Views:

283. Relevant views from the London Borough of Lambeth and the City of Westminster, have been considered.

London Borough of Lambeth Local Views

284. Lambeth's adopted Local Plan Policy Q25 (Views) designates a series of Panoramas, Landmark Silhouettes and Roofscape Views which are of local interest. It seeks to protect their general composition and character from harm. Further visual management guidance is contained in a draft Local Views SPD. The Local Views of relevance here are: Panorama View viii) National Theatre terrace where the proposal would be visible low on the skyline but peripheral to the visual experience and from low on the horizon sitting between the Barbican Towers and City Point.
285. Overall, it is considered the proposal would protect the general composition and character of these Local Views.

Westminster City Council

286. Westminster's Draft Metropolitan Views SPD identifies and describes the significance of views of metropolitan importance including views that are enjoyed from well-known public spaces and those featuring an exceptional townscape or landscape, including visually prominent landmarks. Views 42 A and B (Waterloo Bridge), View 43 Golden Jubilee Bridge (A and B) and these have been reviewed within the LVMF section of the report and the proposals preserve the key elements of the composition identified within the guidance other than the identified impacts to St Bride Church to View 42A close to the northern Embankment of Waterloo Bridge.

287. Overall, it is considered the proposal would protect the general composition and character of these Local Views other than the above identified impact to View 42A.

City Landmarks and Skyline Features, Views of:

288. The proposal would affect views of historic City Landmarks and skyline Features which, in accordance with CS 13, should be protected and enhanced for their contribution to protecting the overall heritage of the City's landmarks in accordance with Local Plan Policy CS13(2). These are addressed individually below:

St Pauls' Cathedral:

289. The impact on skyline panoramic and river prospect views is assessed in the LVMF and Heritage sections of the report. These conclude that in the baseline and cumulative scenarios, the proposals would preserve views of and the ability to appreciate the Cathedral as a Skyline Feature.

Barbican Towers:

290. The impact on the skyline is considered and assessed in the LVMF section and Heritage sections. These are a prominent ensemble on the City skyline as experienced from riparian locations where their distinct vertical geometry and serrated balconies can be appreciated and are easily recognisable from riparian bridges and along the South Bank. From Hungerford Bridge and Waterloo Bridge there would be intervisibilities between the linear green roof of the development and the Barbican Towers partially concealing the lower parts of the Towers but overall this would not diminish their robust landmark status or expressive silhouettes on the skyline which would be preserved. In the cumulative scenarios from these river bridges, the implemented development at 120 Fleet Street would backdrop the proposed development and would significantly increase the occlusion of these towers diluting any impacts from the proposed development.
291. Overall, in baseline and cumulative experiences, the proposal is considered to preserve views of and the ability to appreciate the Barbican Towers as City Landmarks.

Old Bailey:

292. The impact on the skyline is considered and assessed in the LVMF and Heritage sections of the report. In baseline and cumulative scenarios there would be no further diminishment in the clarity of the Old Bailey beyond the impacts of the emerging Salisbury Square Development to the dome on the skyline at the midpoint Hungerford Bridge at Westminster Embankment

(LVMF 17B.1). The stone lantern and the gilded Lady Justice would remain appreciable. Overall, the proposal would not reduce the visual clarity of the Old Bailey as a City Landmark when taking into consideration the baseline scenario.

St Bride's Church:

293. The impact on the skyline is considered and assessed in the LVMF and Heritage section. In baseline and cumulative scenarios there would be an increased diminishment in the clarity of the Portland stone tiered spire of St Bride's Church on the skyline from Waterloo Bridge close to the northern embankment (LVMF 15B.1). The southern aspect of the green roof would momentarily conceal the lowest arched tier of this characterful Wren skyline feature. Officers note that the previous consented scheme at the site (LPA Ref: 19/00058/FULMAJ) had a broadly similar impact on this asset. Overall the proposal would momentarily and partially slightly erode the clarity of St Bride's Church spire as a Skyline Feature.
294. Historic England's consultation response to the proposals, dated 5th August 2024, noted the potential impact on St Bride's Church in views from the Thames and recommended that the proposals ensure there is no blocking or obscuring of the church spire in these views beyond the extent of any existing buildings or permitted schemes. Taking into account the previous consented scheme at the site, the impacts are broadly similar. Officers are aligned with the concerns of Historic England and the impact of the proposals on the skyline as well as the steps to mitigate this are considered and set out within the Heritage and LVMF sections of this report.

Conclusion on City Landmarks and Skyline Features

295. The proposal would protect views of relevant City Landmarks and Skyline Features with the exception of some slight diminishment to St Brides Church. This would result in a degree of conflict with City Plan policy CS 13(2), draft City Plan Policy S13 and CoL Protected Views SPD.

Overall Conclusion on Strategic Views

296. The development in pan-London and strategic views would preserve the setting of St Paul's Cathedral as the Strategically Important Landmark which go to the heart of the character and identity of the City and London.
297. In the baseline and cumulative scenarios the proposal would slightly erode the clarity of St Bride's Church (LVMF 15B.1). As such, the development conflicts to a small degree with Local Plan Policy CS13 (1 and 2), Emerging City Plan Policy S13, London Plan Policy HC4 , GLA LVMF SPG and City

of London Protected Views SPD and Westminster's Draft Metropolitan Views SPD View 42A.

Other Views

298. As a midrise building, the proposals would not be visible in other strategic 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 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.

Built Heritage

Direct Impacts:

Tipperary Public House, 65 Fleet Street (Grade II)

Significance:

299. In January 1987, The Tipperary Public House was listed as Grade II with the public house dating back to 1667, but with a much-altered frontage dating from 1895. The mid-terrace building is hemmed in with the other facades that form the northern block of the Whitefriars development, with the pub remaining a standalone independent element detached from the rest of the scheme. The significance of the building is derived from its historic, architectural and evidential values.

Historic Value:

300. The pub was constructed in 1667 as part of an extensive reconstruction of the area following the Great Fire of London. Originally known as "The Boar's Head" until 1936, where it was renamed as "The Irish House" before becoming "The Tipperary" later on. Initially the pub occupied a single plot with a yard at the rear and a passage on its western side. After the Great Fire, much of Fleet Street was rebuilt initially on slim building plots that related to the pre-fire widths of buildings. The pub forms one of these plots, part of a collection of historic pubs along Fleet Street that provides a good example of the dense mix of development found along Fleet Street which has evolved over time.
301. The pub saw substantial alterations in 1895 and again in 1936 which saw a new frontage and insertion of two staircases to the north and south of the

ground floor following the removal of the original central staircase at ground and first floor levels. The roof was also likely replaced in this period.

302. The pub is noted for having strong connections to the Irish community, with contested claims that it was London's first Irish pub and the first pub to sell Guinness in the capital. This is reflected within its architecture with imagery such as clovers in the mosaic flooring, and elements of Irish language displayed within the décor.

Architectural / Artistic Value:

303. The building provides a good example of a narrow width traditional pub typical of the 17th century, despite the later alterations to the façade, with a cellular historic pub floor plan which has largely remained.
304. The ground floor is noted for its heavily ornate appearance, with intricate wood carvings on panelling and joinery that surrounds the bar area. The dark varnished wood demonstrates a good level of craftsmanship, with detailed and unique designs alongside the textured panel roof. A mosaic lines the floor of the bar with decorative clovers. The level of detail to the interior decoration is considered to be of particular high quality. On the upper floors, the original double range layout has been retained with an early turned baluster staircase – considered to be of particular sensitivity owing to its contribution to the significance of the building. The fifth floor and roof are later additions, of reduced interest.
305. Overall, the significance of building is considered to be high and retains a moderate sensitivity to change.

Setting:

306. Setting makes a moderate positive contribution to an appreciation of the building's significance, although this contribution is layered. The length and breadth of Fleet Street is appreciated as an historic route and this amplifies an understanding of the pub's longevity on the site. Equally the narrow plot width of the site also creates the sense of piecemeal development of the street over time, again creating the sense of an organic historic urban environment. The surroundings include a number of other historic pubs, and this creates a degree of group value where the site is appreciated as part of an established typology found along Fleet Street associated with serving changing custom.

Detailed Proposals and Justification:

307. Paragraph 206 of the NPPF requires clear and convincing justification to support listed building consent where there is harm or loss to the significance of an asset. Following the closure of The Tipperary pub during

the Covid pandemic, it is clear that the pub must adapt to meet demands of the present market to ensure its long term viability and operation. As such, several interventions are proposed to the pub. These follow on from a light touch refurbishment that took place earlier in the year to reopen the pub.

308. Demolition works are proposed for the rear wall of the pub, which will also see the removal of an early 20th century staircase between the basement, ground and first floor within the rear landing area. The rear wall has been subject to heavy alterations overtime, particularly following on from the YRM development scheme in the early 1990s, whilst the rear landing area does not contain any elements of heritage significance. Following the demolition of this area, an infill extension would be constructed in the place of the existing rear lightwell removing this feature. This would facilitate the installation of a new lift which would provide inclusive access to each floor of the building. In addition, a new stairwell would be provided as well as a link to the adjoining building at No.67 Fleet Street which would become part of the pub's demise as a restaurant area.
309. As part of these changes at ground floor level, there would be a need to remove elements of the existing wooden panelling on the rear wall of the pub. A methodology statement would be required for dismantling, storage and repairs for all components as well as reinstatement as part of these works. The methodology and work for all stages would be conditioned to be undertaken by an appropriate expert. Other changes at ground floor level, include the re-hanging of the internal entrance doors to swing inwards to improve accessibility and circulation into the pub.
310. At the upper floor, changes in addition to the loss of the rear wall / windows at each level include the removal of the dumb waiter at first floor level, the removal of later 20th century fittings and stud walls such as the toilets on the second floor, non-original kitchen equipment and other storage areas which are not considered to be of heritage value.
311. At roof level, the existing mono pitched roof which slopes down towards the front elevation would be retained. However, the rear existing walls would be demolished to below the Level 05 slab to allow for a new floor slab to project over the rear roof element of The Tipperary behind the parapet line to enable the upward extension above it associated with the student accommodation works.
312. Other internal works include the addition of new partition walls to accommodate new private dining areas at second and third floor level, new WC facilities and staff space. There would also be repairs to the existing windows, making good of any damaged elements. No changes are proposed to the bars at ground and first floor level. Back of house areas including the kitchen and toilets would be provided in the adjacent building

at No. 67 following the new connection between the two buildings. Details of this would be secured via way of condition.

313. No external changes are proposed to the front elevation of the asset.

Impact:

314. The demolition of the rear wall and windows as well as the infilling of the lightwell to the rear of the pub would result in a low level of less than substantial harm through the erosion of the historic floor plan. However as outlined above, due to the extent of alterations limited to the rear, this area is generally considered less sensitive to change, and this aspect of the works will preserve those more sensitive spaces to the front of the pub.
315. There would still be a sense of the 17th century cellular floor plan, which would remain largely legible and would see improvements through the removal of unsympathetic partitions and other additions which have been added over time – particularly to the second floor, where elements such as the bathrooms have disrupted the legibility of the original floor plan. The proposed works would largely reinstate this double range, cellular floor plan.
316. In addition, a number of benefits would arise from the interventions including improved circulation and enhanced accessibility with step-free access provided to each floor for the first time. The new connection to No.67 Fleet Street would enable the pub to diversify its offering with new restaurant space, yet not causing any change to the ground floor and first floor bars which would remain primarily for drinking. Furthermore, the turned baluster staircase at the upper levels would be preserved with the double range layout repurposed with new private dining areas and back of house uses.
317. The works to the roof would not result in any loss of original fabric to the pub, with the existing roof being an extension on the original. The front element of the roof form sitting beyond the parapet line would remain unchanged giving the pub a standalone appearance externally which preserves its narrow width frontage along Fleet Street.
318. As such, Officers conclude that as a result of the loss of the historic rear walls, windows and lightwell, which would to an extent dilute the historic floor plan, that the proposals would result in a low level of less than substantial harm to this asset.

Change within the setting of the Listed Building:

319. It is proposed to provide a link between The Tipperary and the adjacent unit at ground and first floor level of No.67 Fleet Street. Although interlinked, the Tipperary would remain independent in terms of plan form with the

connections provided within the infill extension of the lightwell therefore limiting interventions within the original cellular floor plan.

320. The proposed changes to both the wider northern and southern blocks would result in a clear change to the setting of the asset, however, it is not considered to dominate or harm the setting of the designated heritage asset. The altered façade and archway element on the northern block with a Portland stone finish would be more complementary and not compete with the asset with a more muted and contemporary finish. The roof extension element would be set back beyond the pub to ensure that it retains its standalone profile as a distinct building part of the organic development of Fleet Street over time.
321. Owing to the narrow nature of Fleet Street, there would be no intervisibility between the asset and the proposals on the southern block other than small glimpses as you move along the street.
322. Officers consider that the proposals amount simply further change in the surroundings of the asset, as part of the ongoing, organic evolution of urban development on Fleet Street. As such, officers consider that the scheme would preserve the contribution made by setting to the significance of the listed building although the proposals would not preserve the significance of the listed building overall through the harm caused by the direct impacts set out above.

Remains of Former Whitefriars Convent (Grade II)

Significance:

323. The remains of the Former Whitefriars Convent were designated as Grade II in January 1950, and comprise a single ragstone vaulted chamber which dates from the 14th century. The remains were relocated to its current position following late 20th century archaeological excavations, where it sits below ground level within the southern boundary of the site. The significance of the building is derived from its historic, architectural and archaeological values.

Historic Value:

324. The historic interest of the crypt relates to it being a rare surviving element of an urban Carmelite Friary, demonstrating the Carmelite migration to Europe during the 13th century following religious conflict in the middle east and illustrates how they established themselves in London. The Carmelites, also known as Whitefriars from the white cloaks they wore, originated as hermits on Mount Carmel during the late 12th or early 13th century. Following the Arab reconquest of the Holy Land, they migrated to Europe, establishing provinces in Cyprus, Sicily, and eventually England by 1242.

325. The crypt, which is the vaulted basement of the Prior's house, is a rare example of a late medieval ancillary building associated with the convent. Whilst the crypt has been relocated from its original location, it still remains in proximity to the original location of the Friary which was dissolved in November 1538.

Architectural Interest:

326. The main architectural interest of the crypt is attributed to its plan form and the craftsmanship employed in its construction in addition to the typology. The plan form of the Crypt depicts how the vaulted undercroft of the Prior's house would have been laid out, with the entry points indicating how the crypt was entered via a turret staircase on its western face and the doorway to the south showing that the crypt would have had a double range layout.
327. The crypt displays a high level of craftsmanship, illustrating medieval ecclesiastical masonry work and the at the centre of the curved stone vaulted roof is a corbel form from which eight stone ribs project. This supports the roof and provides decorative elements. The arched doorway to the south survives well, with the original stone voussoirs that surmount the door still well discernible. The interior of the crypt is ashlar stone. Detracting elements include 20th century brick infill on the south face of the crypt.

Archaeological Interest:

328. The crypt provides archaeological interest as it is evidential in the sense it holds evidence of human activity. The crypt was the undercroft to the Prior's house, and therefore depicts how circulation routes would have been present within the building as well as the ways the house would have been used. The undercroft would have been used for storage, and originally formed part of a double range basement as demonstrated by the doorways and plan form.

Setting:

329. The setting of the Crypt does not make a contribution to the significance of the asset, as a result of the relocation of the asset as part of the YRM development of the site in the late 1980s / early 1990s. The crypt is an entirely self-contained element and a surviving fragment of a once substantial convent and wider late medieval London. The asset has been decontextualised, with its setting now defined by modern commercial development from the 19th, 20th and 21st centuries.

Impact:

330. The proposals for the crypt would not result in any changes to the structure itself, and instead involve alterations around the remains. The single storey extension around the lightwell at ground level, would enable the creation of

a double height space giving visitors a better ability to appreciate the remains, which are presently constrained by their suboptimal location and surrounds.

331. The new enlarged space would showcase historical interpretation about the Crypt and the Whitefriars, as well as allowing for exhibitions and displays to complement the remains. The inclusion of step free access would enable the asset to be enjoyed by all. The proposals would not change the significance of the asset, but the investment made would allow for its long term preservation which would sustain its value longer term. Therefore, the proposals are considered to result in a moderate enhancement to the ability to appreciate the significance of this asset.
332. Historic England's consultation response to the proposals, dated 5th August 2024, stated that subject to detailed design considerations the "proposals have the potential to enhance the significance of the remains" as a result of the greater public access and understanding. The package of enhancements including repair, future maintenance, public access, interpretation including cross referencing to other publicly accessible activities will be secured through conditions and S106.

Fleet Street Conservation Area

333. The impact here would be direct, as a result of the works to the northern block, which sits within the Fleet Street Conservation Area, and in-direct, as a result of change in the wider setting of the Conservation Area.

Significance:

334. The character and appearance and heritage significance of the Fleet Street Conservation Area is summarised in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration. It summarises that core significance and character stem from:
- The ceremonial grandeur and commercial bustle of Fleet Street, the broad, main route running east to west through the City;
 - The evocative historic network of streets, lanes and alleys either side of Fleet Street, particularly to the north, which are contrastingly intimate;
 - A variable urban grain with contrasts between broad main street, subsidiary alleys and formally planned Circus;
 - An exceptional richness and variety in architectural styles and building ages, including 17th century timbering, narrow Victorian eclecticism, understated Georgian domestic frontages, dignified commercial architecture, and monumental 20th century newspaper buildings;
 - The highly significant grade I listed churches of St Dunstan-in-the-West and St Bride's, which has perhaps the most recognisable of the City Churches' spires;

- The views of St Paul's Cathedral from Fleet Street and of St Dunstan-in-the-West backed by the Royal Courts of Justice from Ludgate Circus, both of which create a strong sense of ceremony;
- A long-lived association with the newspaper industry that unusually persists despite their recent departure from the area (for example, St Bride's church continues to be known as the Journalists' church);
- Associations with nationally significant literary figures such as Dr Johnson and Oliver Goldsmith;
- Associations with medieval institutions such as the Knights Templar, Whitefriars, the Inns of Court and the clergy, as well as current associations with the legal quarter;
- An area originally outside the City wall, developed since the Great Fire of London (1666) on what was formerly a low-density suburb on a key route between the City and Westminster.

335. The Conservation Area is of outstanding local and national architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric, and to a lesser but significant degree via setting.

Contribution of Setting:

336. Elements of setting make a significant contribution to significance, and views and vistas deemed integral to that significance are identified in the SPD. The main contribution comes via the below:
- Those approaches and views along the Processional Route, both east and west, towards the Strand and the Royal Courts of Justice to the west and St Paul's to the East (Note Views 1 and 2 in the SPD, for example). This makes a significant contribution to significance and an appreciation of it.
 - Those sensitive strategic riparian broad prospects from the South Bank Queen's Walk which allow an appreciation of the wider skyline of the Conservation Area in a wider London context, in particular as a picturesque ensemble of national monuments and landmarks lining the Processional Route with a skyline presence to London's River. This makes a significant contribution to significance and an appreciation of it.

Impact:

337. The proposals for the northern block would retain and enhance the active frontage along Fleet Street, including the retention of The Tipperary Public House as well as retail units at ground floor, which contribute to the commercial bustle of Fleet Street as the broad main route running east to west through the City. The proposals would introduce a new land use, in the form of student accommodation, on the upper floors of the northern block which further contribute to the vibrancy of the street by diversifying the mix

of uses resulting in a greater mix of users, visitors and residents helping ensure its long term vitality.

338. The retention of the historical facades of Nos.63, 66 and 67 alongside the appropriate disposition and hierarchy of the new facades to Nos.64 and 65 ensures that the buildings fit comfortably into the historic townscape of Fleet Street which is predominantly defined by narrow plot widths with a diverse and varied mix of architectural styles and differing heights. The stepping of the double height mansard roof with accentuated parapets alongside different dormer styles would reinforce the distinctive facades below of the northern block in line with the sense of the piecemeal and organic development of the Conservation Area overtime.
339. The development would retain the existing building lines within the Conservation Area ensuring that the urban grain and structure is consistent with the finer grain historic structure of the Conservation Area. The proposals would retain the courtyard and arched passageway, in keeping with the wider informal network of passageways, courtyards and alleyways beyond Fleet Street. As such, the proposals would result a compatible urban grain and structure which would embrace that distinctive pattern of informal and formal townscape, of grandeur and intimacy and of high quality and distinctive spatial contrast.
340. On the whole, the architectural dressing of the northern block would contribute to the exceptional richness in a variety of styles and ages as identified within the SPD. The new façade elements of the proposals would be finished in high quality materials including Portland stone would further ensure that the proposals fit comfortably within the prestige and gravitas of the Processional Route.
341. The southern block is fully outside of the Fleet Street Conservation Area and its impacts are confined to the setting of the designated asset. There would be no adverse visual impacts from the proposals to the southern block on Fleet Street, with visibility limited to short glimpses when passing Whitefriars Street or Bouverie Street. The changes to the block with a lighter materiality and a new crown are well considered and would be compatible with the setting of the Fleet Street Conservation Area.
342. Overall, the scheme in its entirety would be of a scale, structure, urban grain, disposition, form and appearance consistent with the wider character and appear and setting of the Fleet Street Conservation Area, and would deal sensitively with the Grade II Tipperary Public House and the non-designated historic assets of Nos.63 and 67 Fleet Street.
343. Fleet Street has continuously evolved over time with a rich diversity of architecture tracing the centuries, and the new element would build upon

this organic development retaining the finer urban grain and narrow width frontages whilst introducing new high quality materials and a good level of architectural articulation in the new facades and roof extension. As such it is considered that the proposals would have a neutral direct impact on the Conservation Area and a neutral indirect impact on the setting of the Conservation Area.

344. Historic England's response to the proposals, dated 5th August 2024, stated that subject to detailed design and execution that the proposals are "unlikely to have a harmful impact on the character and appearance of the Fleet Street Conservation Area." The final detailed designs including samples of materials will be secured through conditions.
345. The City of London Conservation Area Advisory Committee response to the proposals, considering the direct impacts on the Fleet Street Conservation Area, confirmed that they had "*no objection to the proposed uses. Members acknowledged that the greater part of the site lay outside the Fleet Street Conservation Area and that there was already a large building south of the Fleet Street frontage. There were no objections to the proposals as far as they affected the detailed treatment of the buildings in the Fleet Street Conservation Area, including the added storeys and the new entrance.*"

Non-Designated Heritage Assets

63 Fleet Street

Significance:

346. This corner building bookends the western end of the wedge-shaped development block with a narrow two bay frontage to Fleet Street and a five bay plus later infill extension to Bouverie Street. Significance is derived from historic associations, architectural and artistic quality as well as group value.

Historic Value:

347. Designed by Frank Matcham and Co, a practice associated with the grand late nineteenth century west end theatres, the building dates from 1922 and is synonymous with the heyday of the printing industry which has defined Fleet Street and was formerly headquarters for the Scotsman.

Architectural and Artistic Interest:

348. Externally the five storey principal Portland stone elevations are well preserved with Italian classical detailing and traditional proportions utilising high-quality materials characteristic of the prevailing area. The elevations above ground floor are expressed with triple height flat pilasters, stone cills, corner medallion and brackets with a defined cornice with scrolls and dentil course. Windows are subdivided and metal framed with attractive balconies accentuating the penultimate storey. The chamfered corner is expressive

and the entrance is well defined with a raised architrave central dropped scroll and stone panels. The Bouverie Street elevation is part Portland stone and masonry with simplified embellishment and the later extension is of limited interest and overall internally the building was rebuilt following bomb damage. The stone attic storey terminates the building with a later inconspicuous simple slate pitched roof. Overall this a handsome corner building with well-preserved rich embellishment executed to a high standard.

Group Value:

349. The former associations with journalism, the press, classical appearance and materiality embed the building in the rich history of Fleet Street and provide linkages with similar buildings from this period including in the immediate context Reuters, Daily Express Building and the Telegraph Building. The building successfully bookends this block with No 67 as a complementary pair of early twentieth century Portland stone buildings.

Impacts:

350. The proposal, as described previously would result in the loss of some historic and modern fabric including the pitched roof and later infill to Bouverie Street.
351. The façade of No.63 Fleet Street would be retained and cleaned with no changes proposed on the northern elevation. On the western elevation a secondary door would be replaced with a window to match the design of other elements of this facade's fenestration. The roof to this façade, which is non-original and associated with the 1988 redevelopment, would be demolished and replaced with a two storey double pitch mansard roof extension. Dormer windows would be set within the roof, providing visual interest with the fenestration language referencing the crissall windows found on the façade below, and are considered to provide an appropriate termination to this façade. The retail uses at ground floor would utilise the shopfront elevations and the student accommodation would be located in the rooms above. Overall these physical changes employ a restrained traditional approach compatible with local character and materiality and whilst the roof would be more prominent in views these would be limited due to the orientation of the block and narrow frontage. The addition would be modest and so preserve the significance of the non designated heritage asset.
352. Elsewhere the wider alterations in relation to this northern block including to the Tipperary and to the rebuilt Nos 65 Fleet Street have been designed coherently as a distinct group fronting Fleet Street and not detract from the identified elements of significance. The southern block to site has a distinct but complementary presence which would successfully integrate with this corner building. Direct and indirect impacts to the non-designated heritage

asset would be neutral. Conditions will be attached to ensure retention of features and to manage the facade cleaning.

67 Fleet Street

Significance:

353. This curved corner building bookends the western end of the wedge shaped development block with a narrow two bay frontage to Fleet Street and a five bay plus later infill extension to Bouverie Street. Significance is derived from historic associations, architectural and artistic quality as well as group value.

Historic Value:

354. Designed by AAH Scott, dates from 1930-2 part of the interwar commercial building along Fleet Street and was the headquarters for the Nottingham Guardian and Nottingham Evening Post. Former associations of the site with Clockmakers are marked by a plaque.

Architectural and Artistic Interest:

355. Externally the four storey elevations are well preserved employing traditional proportions and utilising high-quality materials characteristic of the prevailing area. The elevations are restrained comprising a rusticated ground floor with arch headed windows to Whitefriars Street including secondary entrance. Above rises a hierarchy of metal sash windows with stone framing and key stones to the first and second floor with a smaller attic storey above. The curved corner is accentuated with a series of stone framed venetian style windows through the facade and recessed arched entrance. Above the deep cornice is a pitched slate roof with a series of relatively heavy dormers. Overall this a classically detailed high quality period building which responds successfully to the corner townscape location. Internally the building has been heavily rebuilt following bomb damage.

Group Value:

356. The building evokes the classical appearance and materiality embedded along Fleet Street, the most prolific is Portland stone including in the immediate context Reuters Building and Telegraph Building. The building also successfully bookends this block with No 63 as a complementary pair of early twentieth century Portland stone buildings.

Impacts:

357. The roof including the existing dormers to this elevation would be demolished, and an additional storey clad in Portland stone to match the existing attic level would be added above the existing datum effectively stretching the façade. At roof level, this element would also benefit from a part single storey, part double storey mansard roof extension – with the double storey mansard located on the eastern elevation. The single storey

element would adjoin the Tipperary pub, thus the single element reduces visual discordance. In long views west along Fleet Street the upper storeys to Bouverie would have limited visual impact due to the screening provided by the emerging Court Building. The lower dormers would take reference from the existing dormers of the building, whilst the upper windows would be velux windows to ensure subservience. The ground floor would retain its rusticated facade hosting an active restaurant uses complementing its higher status and student accommodation is located above.

358. Overall these changes employ a restrained traditional approach compatible with local character and materiality and whilst the roof would be more prominent and the stretched façade results in a changed proportion to the façade these are seamless and modest interventions which would preserve the elements of significance of this non designated heritage asset. Elsewhere the wider alterations in relation to this northern block including to the Tipperary and to the rebuilt Nos 65 Fleet Street have been designed coherently as a distinct group fronting Fleet Street and not detract from the identified elements of significance. The southern block has a distinct but complementary presence which would integrate with this corner building. Direct and indirect impacts to the non-designated heritage asset would be neutral. Conditions will be attached to ensure retention of the features in addition to managing the facade cleaning.

Indirect Impacts:

Listed Buildings

St. Paul's Cathedral (Grade I)

Significance:

359. London's and one of the nation's most famous landmarks, it was London's first cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother cathedral of national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration.
360. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and crafts people overtime) and of the distinct English baroque style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital.

361. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.

Setting:

362. In terms of setting, for hundreds of years it was the tallest building in London. It was strategically sited atop Ludgate Hill, a rare topographical moment in City of London and one of its highest points, with a commanding position overlooking the River Thames. Following the great rebuilding act (1667), Wren had little influence over the even immediate, never mind wider, setting. The setting has been substantially altered over time often with the setting of the Cathedral at its heart, and to various degrees those elements together make a substantial contribution to significance and an appreciation of it, in particular the architectural, artistic, historic and communal significance. Those contributing elements are deemed in descending order of importance.

- i) those wider strategic plan-London riparian views from the Thames, it's embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.
- ii) The ancient processional route of royal and state national significance along The Strand/ Fleet St, a 'national spine' of celebration and contemplation, along a route between the heart of government in Westminster and commerce in the city, where St. Paul's is the pre-eminent culmination and destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.
- iii) Those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. These make a substantial contribution to significance and an appreciation of it.
- iv) Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted in ad hoc and some

active townscape curation over the generations, in particular from St Peter's walk (South transept axis), Cannon Street, the Paternoster Square development, amongst others, where the cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This makes a moderate/significant contribution to significance and an appreciation of it.

Impact:

363. In terms of the impact on the Processional Route, the architecture lining the Fleet Street section of the route is eclectic and diverse with varied floor plates, sizes and architectural styles and includes landmark buildings such as the churches of St Dunstan, St Brides and St Martin Ludgate, banks such as Hoare's and offices such as the Daily Telegraph and Daily Express.
364. The views of St Paul's change along the length Fleet Street depending on the topography and alignment of buildings. Views unfold as the observer walks eastwards along the northern side of Fleet Street. The experience is dynamic, rather than static and the buildings on the southern side unfurl to gradually reveal St Paul's Cathedral. The viewing experience has been subject to long-term curation as a kinetic townscape sequence and experience.
365. The views begin on the north side of Fleet Street at the junction with Fetter Lane in a series of visual sequences. From Fetter Lane the south side of the street, larger historic buildings frame the view including the Reuters Building (grade II), behind which the spire of St Brides can just be glimpsed. The existing buildings on the site have a relatively consistent building scale and relate well to the overall scale of Fleet Street and these lead the eye to the Cathedral. Opposite, on the north side, are the prominent former offices of the Daily Telegraph and Daily Express. The Cathedral appears in the view: the lantern, a sliver of dome, peristyle and the north-west tower are all visible. There is a pleasing juxtaposition of the spire of St Martin Ludgate, the north-west tower and the dome, arranged in a rising progression.
366. The proposed height and massing of the northern block would be visible to the right of St. Paul's, however, the experience would be fleeting as you travel eastward along Fleet Street from the junction of Fetter Lane towards the site. Furthermore, from these vantage points, cumulatively, developments including the Salisbury Square Courts would sit in the background of the development site and the proposal would add a further layering in the foreground of this neighbouring development forming part of the wider townscape. Moving further eastward along the Processional Route, there would be no impact on the cathedral.
367. The massing of the roof extension, with its double height mansard with the upper most storey set back would ensure the proposals would fit

comfortably within the wider townscape composition along the Processional Route as not to be distracting. The new façade elements of the proposals would be finished in high quality materials including Portland stone would further ensure that the proposals fit comfortably within the prestige and gravitas of the Processional Route.

368. Overall, St Paul's would remain in focus as the pre-eminent landmark and the contribution that the Processional Route makes to the significance of St. Paul's would be unharmed, with the proposal having a neutral impact. The other setting impact is on those strategic City-wide riparian views from the banks of the Thames and its bridges. At no point would the pristine, sky-etched silhouette of the Cathedral be obscured or shadowed by the proposal, which would be sited some distance from it in these broad panoramas, and where it would accord with the prevailing heights and datums so as to not dilute the varying pre-eminence of the Cathedral's skyline presence. Thus, this significant contribution of setting to significance would be preserved.

St. Bride's Church (Grade I)

Significance:

369. Portland stone Church of 1671-8 by Sir Christopher Wren with spire of 1701-3, one of Wren's tallest and comprising five octagonal stages of diminishing height. The spire is one of the most distinctive and memorable on the city's skyline, appreciated from within and outside of Fleet Street Conservation Area. The skyline presence when viewed from the bridges and banks of the Thames makes a significant contribution to significance, especially where the spire can be seen as part of the romantic historic skyline around the Temples to Blackfriars and in association with St Paul's. Those varied and more incidental local views from Fleet Street and Ludgate Hill are also significant, albeit less so. Those further afield riparian views of the spire from the east are also significant, albeit less so again. The church was gutted in the Blitz and restored by Godfrey Allen in 1957. The associated excavations by Professor Grimes in 1952-3 comprised the first complete archaeological investigation in England of a parish church. They revealed that the site of the church had been in use since the Roman period.
370. It is of outstanding national architectural / aesthetic, artistic, historical, archaeological and to a lesser extent communal significance.

Setting:

371. Elements of setting make a significant contribution to architectural and historic significance, in particular an appreciation of it. In relative order of contribution, it is considered that this derives from:

- Pan-London broad riparian views from the River Thames, its embankments and bridges, including strategic LVMF River Prospect views from Waterloo Bridge, Gabriel's Wharf, Hungerford Bridge, Southwark Bridge and London Bridge, where it can be appreciated as a landmark steeple atop the rising banks of the Thames, denoting the processional route and seen in complementary juxtaposition with Wren's masterpiece, St Paul's. These make a significant contribution to architectural/aesthetic and historical significance.
- Local, often glimpsed, sudden and fleeting local views from Fleet Street, St Bride's Avenue, Bride's Passage and Bride Lane allow for the full force of Wren tower and steeple to be appreciated in an intimate townscape context conjuring the sublime. This makes a moderate contribution to architectural and historic significance, especially an appreciation of it.
- The local topography and change in levels which allow for an appreciation of the burial site and it marking a climb from the riverside making a modest contribution to architectural/aesthetic, historical and archaeological significance.

Impact:

372. There would be a change to the setting of St Bride's Church in the baseline kinetic viewing experiences from Waterloo Bridge, Hungerford Bridge, the Southbank and Southwark Bridge. From these locations, St Bride's spire is a legible landmark within a complex urban layering with taller background buildings and lower foreground buildings. The proposed development would form a further urban layer and in some kinetic views from Waterloo Bridge, the lowest tier of St Bride's Church spire would be partially concealed and the setting around the spire further built up and the ability to appreciate the spire in its totality would be diminished.
373. The immediate setting of St. Bride's would remain unchanged and the development on the site which is its wider context setting would not impact on localised views of the spire.
374. Whilst there is presently intervisibility between the site and St Brides from views along Fleet Street, such as adjacent to St Dunstan's Court, this is only temporary associated with the redevelopment of the Salisbury Square site which has now been implemented and the court buildings under construction form part of the baseline assessment. As such, there is no impacts on local views from the development on St Brides.
375. Overall, the development would result in a changed setting of St Bride's Church with a slight diminishment of its landmark present in views identified with the baseline views, namely Waterloo Bridge. The development would partially conceal the bottom tier of the spire, however, this experience would be fleeting as you move along the bridges, where the proposal would remain

as a pre-eminent monument in other locations. Furthermore, owing to the presence of development in the backdrop of St Brides within this view, it is not pristine at present.

376. Officers also note that the previously consented scheme at the site (LPA Ref: 19/00058/FULMAJ) had broadly similar impacts to the Church as the proposal subject to this application, albeit the subject proposals having slight further erosion to the Church albeit in a more streamlined manner
377. This would be a slight diminishment in its landmark presence in views from those identified Thames Bridges in baseline views (see HTVIA View 17). There would be a degree of harm to setting and significance and this is evaluated at less than substantial, at the lower end of the spectrum which would be mitigated as a result of the transient nature of this impact.
378. Historic England in their response to the proposals dated 5th August 2024, confirmed that where any part of the spire of St Bride's Church is proposed to be partially blocked from views, the proposals have the potential to cause harm to the significance of the church through development within its setting. Officers concur with this view, as set out in the assessment above.

King's Bench Walk (Northern) Group – Nos. 1, 2, 3, 4, 5, 6 and 7 King's Bench Walk (Grade I); and Nos.3 North and 8 King's Bench Walk (Grade II*)

Significance:

379. These are a highly significant terrace of buildings within Temples Conservation Area. They are part of a terrace which defines the east side of Kings Bench Walk, and were built as chambers in the late 17th century. They are one of the most complete groups of buildings of that date in London and have high aesthetic, architectural and historic significance. Although there is a variety in the width, height and roofs, they have a strong visual unity and uniformity of appearance with a raised ground floor, central and prominent doorcase, strong cornice line and brick parapet, hipped mansard roofs and a lower ground floor, constructed of dark red and brown bricks with red dressings.
380. Officers consider that because of this strong degree of commonality between them it is appropriate and proportionate to consider them as a group in relation to the proposals, though they are individually listed.
381. Their significance is derived from their special historic and architectural interest, and evidential values due to their date, design and building, as they were constructed for, and still in use as legal chambers. There is a distinctive wide York stone pavement to the front of the terrace with a border of Purbeck setts and mature Plane trees. Kings Bench Walk is an irregular

oblong shape, now used for car parking, which has a gentle slope down to the River Thames. It is bordered on the west side by 1-5 Paper Buildings, Inner Temple Library and on the south side by Inner Temple Garden.

Setting:

382. The principal elements of setting contributing to the significance of these listed buildings are as follows:
- Each of these individually listed building forms a complementary element of setting with the other, making a significant contribution to significance.
 - The neighbouring buildings and spaces within the Temples immediately to the west, including Nos. 1 & 2 Mitre Court Buildings, Paper Buildings, the Francis Taylor Building, and the Inner Library which complement them in aesthetic, style and scale, illustrate the development of the group and help to define the sense of intimacy and enclosure prevailing across the Temple. This makes a significant contribution to significance.
 - The open, verdant setting of Inner Temple Garden and the open, riparian setting to the south, which contrast pleasingly with the framing buildings and which with them generate that singular sense of place which prevails across the Temple. This makes a significant contribution to significance.
 - The open sky setting framing the group in closer views, in particular when there is limited influence of wider built development, accentuating the self-contained and distinct integrity and authenticity of the ensemble. This makes a moderate contribution to significance.
383. The wider setting of the group consist of the environs of Fleet Street beyond, which are generally of a consistent historic scale but with variations in height and instances of a greater scale of development than in the Temples. When viewing the group from the west, a backdrop of modern development, including the existing southern block of 65 Fleet Street and Harmsworth House, appears behind the roofline of the group. The implemented Salisbury Square scheme will also appear in this view when consented. These modern buildings outside the Temples are clearly detached from the intimate setting and make a neutral contribution to the significance of this group of buildings.

Impact

384. While this section considers the impact upon the group as a whole, it is considered that the proposals would most specifically affect Nos. 2-6 King's Bench Walk, to which the proposal site would be closest.
385. As mentioned above, in views of the group from the west along Crown Office Row/King's Bench Walk, there are modern buildings already visible behind them, but appearing as clearly disassociated, recessive modern development beyond; officers consider that the visibility of development behind this group is not necessarily harmful in principle; it is proximity and

scale of development, in this largely low-rise area, which could result in harm.

386. In mid-range views around the Temples, including within its gardens, the proposal would be visible, to varying degrees, as a prominent new form behind this group and would be most acutely visible behind Nos. 2-6 King's Bench Walk (see HTVIA View 12). Whilst outside of and peripheral to their collegiate arrangement, the proposal would result in a sharp increase in background urbanisation and, through its closeness and height, would be visually intrusive in views of this group, and Nos. 2-6 in particular. Whilst obviously modern, the proposal would not be far enough away to read as recessive and completely disassociated from the group in a way that other modern buildings can be; it would be not a modern backdrop form, but a modern visual intrusion.
387. As such, the proposed roof top extension would result in increased visual distraction in the background to this sensitive arrangement of buildings, with an abrupt and sharp change in scale with a further erosion of open sky beyond the roofline through the additional densification and height of development in the background – as demonstrated in HTVIA View 12. This open sky presently helps enforce the self-contained distinct integrity of the ensemble of listed buildings in this group.
388. Whilst the proposal would result in visually intrusive new development within the background to these assets, the views would only be evident in isolated views from western areas of the Inner Temple Garden, Crown Office Row and Kings Bench Walk. Furthermore, the presence of mature trees in the foreground would further soften the visual impacts whilst the roofscape is not full pristine with other development present beyond.
389. As well as this, it is considered that the impact of the proposal would be most acute and pertinent to Nos. 2-6 King's Bench Walk, with the other buildings of the group more visually disassociated from the proposals in the views. As such it is considered that the proposal would result in a low level of less than substantial harm on the significance and setting of Nos. 2-6 King's Bench Walk as individual assets and as a group.
390. Historic England have also identified a low degree of harm to the significance of these assets. The consultation response sets out that the proposals "*would appear on the skyline behind buildings on the east side of King's Bench Walk. We note that existing developments are visible in the backdrop setting of these buildings in longer views from the west and the previous planning permission did introduce development into this area of sky space. As such, the proposed roof extension will appear on the skyline and will distract from the architectural composition of the buildings in King's Bench Walk. As such, the proposals are considered to cause a low degree*

of harm to the significance of the affected heritage assets through development within their setting.” The consultation response goes on to request that the harm is justified and reduced or minimised as far as possible.

391. Officers are aligned with the views of Historic England in this regard and in response, Officers at the City have requested amendments to the scheme. This has seen the removal of habitable accommodation at the 10th floor and changes to the articulation, colouration and materiality of the roof extension. This is considered to have reduced the impact of the proposals on these assets, with a more subordinate, reduced and subdued appearance achieved via these amendments.

Daily Express Building, 120 – 129 Fleet Street (Grade II*)

Significance:

392. This 1932 iconic art deco building with expressive black Vitrolite glass and rounded corners is a bold architectural statement on the northern side of Fleet Street albeit located further to the east of the subject development site. Significance is derived from its architectural, artistic, historical and evidential values.

Setting:

393. The setting of the designated heritage asset is defined by larger former newspaper single block buildings set between historic alleys and comprises a rich variety of styles and materials. In the immediate setting is Reuters building to the south, and Ludgate House, Mersey House and the Telegraph Building to the west which all enhance the setting of the Daily Express Offices. The northern block of 65 Fleet Street are part of this wider setting. This diverse context of larger commercial historic buildings on Fleet Street positively contribute to significance.

Impact:

394. The designated heritage asset is sufficiently robust with a striking standalone architectural identity which is reinforced by the other unique and diverse range of designated assets on the northern side of Fleet Street. The proposed development would complement the existing diverse range of historic buildings with an enhanced materiality more appropriate to Fleet Street on its northern elevation and careful architectural detailing. Overall, the proposal is considered to preserve the special architectural and historic interest and heritage significance of the Daily Express Building, including the contribution made by setting.

Paper Buildings Group: Nos. 1 – 4 and 5 Paper Buildings (Grade II)

Significance:

395. Chambers of 1848. Nos. 1-4 are in a plain, classical design while No. 5, terminating the row to the south, is of a more striking Tudor style. The group embody the rich, dignified mix of styles and materials of the Temples, tied together by a consistent scale and dignified aesthetic. Accordingly, the buildings have high architectural and historic interest.

Setting:

396. The principal elements of setting contributing to the significance of these listed buildings are as follows:
- The neighbouring buildings and spaces within the Temples immediately to the west, north and east, including Nos. 1 & 2 Mitre Court Buildings, Paper Buildings, the Francis Taylor Building, the Inner Library, Harecourt Buildings and Temple Gardens which complement them in aesthetic, style and scale, illustrate the development of the group and help to define the sense of intimacy and enclosure prevailing across the Temple. This makes a significant contribution to significance.
 - The open, verdant setting of Inner Temple Garden and the open, riparian setting to the south, which contrast pleasingly with the framing buildings and which with them generate that singular sense of place which prevails across the Temple. This makes a significant contribution to significance.
 - The open sky setting framing the group, in particular when there is limited influence of wider built development, accentuating the self-contained and distinct integrity and authenticity of the ensemble. This makes a moderate contribution to significance.

Impact:

397. There would be background distant views of the development beyond these assets, but the distances involved would mean it would read as a disassociated part of the modern City and not overly intrusive. The impact to the wider setting of these assets would be similar to existing distant townscape in both baseline and cumulative scenarios which include the Salisbury Square development. The proposals would not worsen the situation or detract from the enclosed setting and its contribution to significance. There would be no harm to the wider setting or significance of these listed buildings.

King's Bench Walk (Southern) Group: 9 – 11 and 12 – 13 King's Bench Walk (Grade II)

Significance:

398. The eastern side of Inner Temple Garden is formed by Sydney Smirke's 9-11 King's Bench Walk a four storey yellow brick terrace dating from 1814 which form continuous terrace. Adjacent to the South, No. 12 – 13 King's

Bench Walk is a later terrace dating from the early 19th century comprising four storeys in a plain, classical design in Bath stone. The significance of these assets is derived from their evidential, architectural and historic values as part of the wider Temples complex.

Setting:

399. The setting of all these assets is defined by Victoria Embankment, the wider landscaped settings and the complex of high value historic buildings which form the Inner Temples. The setting contributes to the unique intimate enclosed collegiate like character of this special area distant from the busy City Streets.

Impact:

400. The potential impact from the development on these assets has been assessed from footpaths and the sweeping lawn which is scattered with trees. There would be glimpsed moments of the proposal rising above these foreground buildings but this would be discreet and largely experienced between trees from incidental locations and the impact would not be adverse. Existing taller buildings already rise slightly including the implemented Salisbury Square development and 120 Fleet Street. The proposals would not worsen the situation for detract from the existing quiet enclosed setting and its contribution to significance. As such, there would be no harm to the wider setting or significance of these listed buildings.
401. The consultation response from Historic England advised harm to the listed buildings on Kings Bench Walk, as discussed above with respect to the northern group. Officers consider that the harm would most specifically affect Nos.2 – 6 Kings Bench Walk and would not arise from the proposals in respect of the listed buildings within the southern group as a result of the siting of the proposals having a lesser impact on these listed buildings with intervisibility limited here.

Inner Temple Registered Historic Park and Garden (RHPG) (Grade II)

Significance:

402. Inner Temple Garden and Middle Temple Garden have a medieval origin and evolved from the 16th to 20th centuries, initially associated with the Knights Templar. Today, the area is defined by its legal professions which have evolved over the centuries and continue to exist here. The gardens are the largest private green space in the City of London and include mature trees, shrubs and considered planting that illustrates a layout developed within the 19th and 20th centuries. The gardens retain a quiet domestic character and are important for the setting of the listed buildings that surround the space where together they have a group value with the garden playing a significant role in the important collection of medieval and later

buildings. The buildings and spaces, including the garden, is set in a distinctive collegiate-style arrangement.

403. In brief, the significance of this Registered Historic Park and Garden is derived from its successive landscape layouts, varied planting and lawned areas, and its domestic gated quiet character representing historic and architectural values.

Setting:

404. The principal elements of setting contributing to the significance of this RHPG are the arcadian but planned character of the registered landscape, in addition to its connection to the open setting of the River. Of equal contribution, by virtue of its juxtaposition, is the sense of enclosure derived from the cloister of buildings in a collegiate arrangement which consistently define its edges. The tranquillity afforded by this landscape also contributes to its experiential quality as rare sanctuary within inner London, which also contributes to its significance.

Impact:

405. The proposed development would be visible from vantage points in the north western section of the gardens, where it would rise above King's Bench Walk – particularly in views along the footpath on the western side of the gardens. As such the proposal would bring in additional visually intrusive development that would lead a further erosion of the sky from these vantage points.
406. This impact would be isolated and contained to the north western section of the garden and the existing townscape beyond the collegiate arrangement around the gardens is not pristine with other developments present. The formal relationship between the surrounding buildings and the gardens would be retained, as would the sense of completeness and quietness in the series of formal spaces that make up the garden. Giving consideration to the above, Officers consider that the proposed development would result in a slight degree of less than substantial harm on the setting of this asset.
407. The Gardens Trust have also identified less than substantial harm to the RPG, and raised objections to the roof extension of the south block. They requested that *“consideration is given to reducing the height of the roof extension by at least two storeys, so that the new development, when viewed from the RPG, appears to rise no higher than the existing buildings (Harmsworth House and 10 Bouverie Street) and the visual intrusion of this modern building into the historic RPG is lessened.”*
408. Officers are aligned with the views of The Gardens Trust in relation to the low level of less than substantial harm on the Inner Temple Garden. Officers at the City have requested amendments to the scheme. This has seen the

removal of habitable accommodation at the 10th floor and changes to the articulation, colouration and materiality of the roof extension. Whilst this has not seen a reduction of two storeys, this is considered to have reduced the impact of the proposals on the asset, with a more subordinate, reduced and subdued appearance achieved via these amendments.

Northcliffe House, 26 Tudor Street (Grade II)

Significance:

409. Northcliffe House is a substantial and striking former printing office dated 1925 – 1926, comprising four storeys plus attic, clad in stone on a steel frame. The deco Neo-Egyptian style of the façade, popular at the time following the discovery of Tutankhamun's tomb in 1922, includes lion heads and Neo-Egyptian fluted curved cornice and pilasters, found elsewhere at the former Daily Telegraph building on Fleet Street. The elevations to Tudor Street and Whitefriars Street are finely detailed and modelled. The octagonal tower emboldens the prominence of the corner entrance and adds interest to the roofline.

Setting:

410. It is prominently located on the western corner of Whitefriars Street and Tudor Street. The gridded street arrangements and diverse architectural styles and materiality of largely commercial buildings of the 20th century make a positive contribution to significance.

Impact:

411. The proposed development to the southern block would rise above this listed building, exacerbated by the rising topography on Whitefriars Street / Bouverie Street and as such the proposal would form part of the wider setting of this building – particularly in views from the south. The proposed architectural articulation would contribute to a new layering and depth to this setting in oblique views northwards. The proposed scale of the development and materiality would be compatible with the wider setting.
412. Overall, the proposal would preserve the special architectural and historic interest and heritage significance of Northcliffe House including the contribution made by its setting.

The Harrow Public House, 22 Whitefriars Street (Grade II)

Significance:

413. The Harrow is a modest 18th century building comprising 3 storeys plus mansard reflecting the historic character of the area. The building's significance is derived from its architectural and historic values.

Setting:

414. The historic setting of the Harrow Pub is presently fragmented due to redevelopment of Salsbury Square to the north which previously hosted Fleetbank House which detracted from the setting of this asset. No element of setting makes a contribution to the significance of the pub.

Impact:

415. The proposed development would not result in any change to the existing eastern building line of the southern block of 65 Fleet Street, retaining the historic street pattern. In addition, further activation would be provided on the southern elevation onto Ashentree Court which meets Whitefriars Street diagonally opposite of this asset. The more active uses of development at ground floor would animate the streetscape and complement the Harrow Public House increasing footfall which would support the continued success as an establishment.
416. As such, the special architectural and heritage significance of the Harrow Pub, and the contribution made by its setting, would be preserved.

Victoria Embankment Group – Hamilton House, Telephone House, No.9 Carmelite Street, Sion College, Former City of London School and Unilever House (Grade II)

Significance:

417. This dignified group of 19th Century buildings have strong architectural interest as a well-detailed and executed series of elevations in a variety of styles and employing a variety of materials to delightful effect; they have historic interest for their associations with their original occupants (a mix ranging from insurance firms to an ecclesiastical college to a school).

Setting:

418. They have strong group value (with the exception of Carmelite House) and together (also with the Temples and Blackfriars Bridge) form a picturesque composition with the river. These two elements of setting make a substantial contribution to significance. Other elements make a neutral contribution.

Impact:

419. In views of the listed buildings from the South Bank, opposite, the tiered massing of the southern elevation and the colouration of the metallic crown would form part of an unobtrusive presence, read as part of a layer of the townscape beyond these buildings. The pre-eminence of the listed buildings within this setting would be unchallenged. Accordingly, the proposal would preserve these listed buildings and the ability to appreciate them.

146 Fleet Street (Grade II)

Significance:

420. No 146 dating from late 17th century has a painted brick elevation to Fleet Street. The rear elevation is simple brick elevation with sash windows and segmental arches of the late 17th century rear elevation and includes a passageway at ground leading from Fleet Street to Wine Office Court. The significance of this building is derived from its historic, architectural and evidential values.

Setting:

421. The setting of the designated heritage asset is defined by larger former newspaper single block buildings set between historic alleys and comprises a rich variety of styles and materials. The northern block of 65 Fleet Street are part of this wider setting. This diverse context of a mix of smaller and larger commercial historic buildings on Fleet Street positively contribute to significance.

Impact:

422. The proposed development would complement the existing diverse range of historic buildings with an enhanced materiality more appropriate to Fleet Street on its northern elevation and careful architectural detailing. Overall, the proposal is considered to preserve the special architectural and historic interest and heritage significance of 146 Fleet Street, including the contribution made by setting.

Ye Olde Cheshire Cheese Public House, 145 Fleet Street (Grade II)

Significance:

423. A late 17th century, heavily altered modest terraced building intrinsic to the historic core of Fleet Street located on the north side of Fleet Street. The significance of the building is derived from historic, architectural and evidential values.

Setting:

424. The existing setting is defined by an eclectic mix of building types both the monumental scale of former newspaper buildings including Daily Express office, Mersey House and The Telegraph Building as well as the finer urban grain of 143-144 and 146 Fleet Street which are now retail and commercial buildings and more modern infills. This setting positively contributes to the historic values of the listed building.

Impact:

425. The proposed development is located diagonally opposite this asset, however, would not substantially alter its setting. The proposal is well

designed and detailed on the northern block with appropriate materials that are of a high quality and durable that are better aligned with the wider character and appearance of Fleet Street. This would complement the diverse setting of this asset, whilst its height, bulk and massing would not detract from the values of this asset. Overall, the proposal would preserve the special architectural and historic interest and heritage significance of 145 Fleet Street including the contribution made by setting.

143 and 144 Fleet Street (Grade II)

Significance:

426. The building dates from 1905 and is steel frame with vigorous almost ecclesiastical Gothic, with a lone central statue of Mary Queen of Scots. The significance of the building is derived from the artistic historic, architectural and evidential values.

Setting:

427. The setting of the listed building is architecturally diverse and representative of Fleet Street's rich history including the more historic narrow finer grain buildings to the west and the larger commercial floor plates of the 20th century. This diverse context and richness of building types contributes to the significance of the listed building.

Impact:

428. The designated heritage asset has a robust five storey scale, decorative architecture and is set within a cluster of other historic designated assets on the northern side of Fleet Street which provide a defined local setting which enhances significance. The detailed design of the northern block would complement this diverse setting and its massing would not detract from the listed building's significance. Overall, the proposal would preserve the special architectural and historic interest and heritage significance of 143 and 144 Fleet Street including the contribution made by setting.

Daily Telegraph Building, 135 – 141 Fleet Street (Grade II)

Significance:

429. The Daily Telegraph Building dates from 1928-31 and is a monumental former newspaper headquarters in Portland stone comprising 6 storeys and a recessed additional storey and includes giant columns and showcases Egyptian ornamentation. The significance of the building is derived from the former artistic historic, architectural and evidential values. This is a robust building with a strong architectural identity.

Setting:

430. The Daily Telegraph Building dates from 1928-31 and is a monumental former newspaper headquarters in Portland stone comprising 6 storeys and a recessed additional storey and includes giant columns and showcases Egyptian ornamentation. The significance of the building is derived from the former artistic historic, architectural and evidential values. This is a robust building with a strong architectural identity and would be a similar height and materiality to the Court Buildings which would be directly opposite.

Impact:

431. The designated heritage asset has a robust scale, decorative architecture and is set within a cluster of other historic designated assets on the northern side of Fleet Street which provide a defined local setting which enhances significance. The detailed design of the northern block would complement this diverse setting and its massing would not detract from the listed building's significance. Overall, the proposal would preserve the special architectural and historic interest and heritage significance of the Daily Telegraph Building including the contribution made by setting.

Mersey House, 132 – 134 Fleet Street (Grade II)

Significance:

432. Dating from 1904-6 this successful Portland stone narrow 5 storey building has a big arched ground floor and is nestled amidst other larger commercial buildings. The significance of the building is derived from their former, historic, architectural and evidential values.

Setting:

433. The building has a similar setting to the Daily Express offices and is defined by the larger commercial buildings on the north and south sides of Fleet Street. In the immediate setting is Reuters building (grade II) to the south, Daily Express office (grade II*) and the Telegraph Building (grade II*) to the west which all enhance the historic and architectural significance of Mersey House reflecting the rich commercial and newspaper history of Fleet Street and forms a unique hub of eclectic architecture.

Impact:

434. The designated heritage asset has a robust scale and identity set within a cluster of other historic designated assets on the northern side of Fleet Street which provide a defined local setting which enhances significance. The detailed design of the northern block would complement this diverse setting and its massing would not detract from the listed building's significance. Overall, the proposal would preserve the special architectural and historic interest and heritage significance of Mersey House including the contribution made by setting.

Listed Buildings Further from Development Site

Central Criminal Court, Old Bailey (Grade II*)

435. Designed by EW Mountford between 1900 and 1907 with a distinctive copper domed roofed dome on a Portland stone base with stone lantern bearing a gilt and bronze statue of Lady Justice. The significance of this asset is derived from historic, architectural and evidential values. The existing dome, lantern and Lady Justice is a recognizable silhouette on the London skyline and these significant features contribute to views from the river setting. The existing setting of the listed building is urban layering with taller buildings (Barbican Towers and 200 Aldersgate Street) background buildings and lower foreground buildings which truncate the listed building.
436. The proposed development would form a further layer and in the kinetic experience from Hungerford Bridge. In baseline views the dome will be largely concealed by the Salisbury Square Development from the northern embankment of Hungerford Bridge (LVMF 17B.1). The proposed development would not increase this concealment. The ability to appreciate and recognise the distinctive landmark from this view point would not be diminished and the top of the stone lantern and statue of gilded Lady Justice would remain visible.
437. Officers also note that the previously consented scheme at the site (LPA Ref: 19/00058/FULMAJ) had broadly similar impacts to Old Bailey as the proposal subject to this application, albeit the subject proposals having slight further erosion to the asset.
438. Overall, the development would result in changed setting of The Central Criminal Court, however, when taking into account the baseline scenario of the implemented Salisbury Square development there would be no further diminishment of its landmark presence. As such, Officers conclude no harm to the setting or significance of this asset.

Barbican Towers (Grade II)

439. These 20th century modernist towers have a distinctive and recognizable presence and silhouette on the skyline in city wide views. These landmark buildings have architectural and historical values. The setting of the Lauderdale House, Shakespeare House and Cromwell House as part of the Barbican and experienced in views from Waterloo and Hungerford Bridge is urban layering with a diminishment in scale towards the river. The Barbican Towers are striking vertical landmarks on the skyline as a grouping and their distinctive form is central to their significance.

440. The development would add to the existing urban layering which positively defines their metropolitan setting. There would be intervisibility between the green roof of the proposed development, and the Barbican Towers, with the proposal resulting in some concealment of the lower elements of this designated asset. Nonetheless, in cumulative baseline scenarios from these river bridges 120 Fleet Street would backdrop the proposed development and would significantly increase the occlusion of these towers diluting any impacts from the proposed development.
441. As such, the development would not diminish the group value due to the already complex setting and kinetic nature of the views from the river bridges. There would be no harm to the setting or significance of these listed buildings, particularly given the cumulative scenario, and the proposal would not diminish their robust or expressive silhouettes on the skyline which would be preserved.

Conservation Areas

Temples Conservation Area

Significance:

442. Of ancient origin, the Temples is perhaps the most distinctive City conservation area and has a character that is not only unique to the City, but rarely found elsewhere. It has a restrained, dignified, private and often tranquil character, in pleasant contrast to the hustle and bustle of Fleet Street and the Embankment. It comprises an exceptional collection of outstanding buildings as part of a lush open landscape setting comprising the Inner and Middle Temples and the Temple Church. To summarise the outstanding significance of the Temples derives from:
- It has a distinct and venerable legal quarter of ancient origin resulting in a collection of outstanding authentic survivals from the 17th, 18th and 19th Centuries comprising rare legal chambers, domestic quarters and buildings associated with the Inns of Court.
 - An outstanding townscape of collegiate character comprising courts, squares and streets, and strong sense of domestic human scale, of complementary architectural styles and materials, all set in the verdant setting provided by the Inner and Middle Temple Gardens.
 - Its connections with the Knights Templars and the focus on the Temple Church, based on one of the holiest places in the Crusader world, the Church of the Holy Sepulchre in Jerusalem, it is one of the oldest and most significant ancient churches in the City
443. The Conservation Area has a high concentration of designated heritage assets including Grade I, Grade II* and Grade II buildings alongside the Inner Temple Garden which is a Grade II Registered Historic Park and Garden. The earliest buildings in Kings Bench Walk date from the 17th

century and are one of the most complete groups of buildings of that date in London and have high aesthetic, architectural and historic significance. There are a number of mature trees including a distinctive avenue of trees on the southern boundary with Victoria Embankment. The buildings all share a uniformity of design and materials amongst the generous landscaped setting.

Setting:

444. The setting has a clear sense of separation between the inward and enclosed quite collegiate character of Temples which turns its back on the bustle and noise of surrounding streets which define its wider setting. There are glimpses of this wider setting above rooflines and between buildings but the encroachments are modest and where buildings are visible they do not detract or dominate from the overall character, appearance or significance.
445. Elements of setting make a significant contribution to significance and an appreciation of it, in the form of environmental qualities, in particular views of and through it, but also of wider intangible qualities. In relative order of contribution, those elements comprise:
- Strategic pan-London kinetic views from Hungerford and Waterloo Bridges and the South Bank Queen's Walk looking north and east, where it is seen as part of the Victoria Embankment and as part of the wider skyline. These make a significant contribution to significance and an appreciation of it.
 - Those views out of and through the Conservation Area of the sky, in particular when there is limited influence of wider built development, accentuating the self-contained and distinct integrity and authenticity of the Conservation Area ensemble. These make a significant contribution to significance.
 - Views into the Temples which act as 'portals' which transition between the bustle of Fleet Street / the Embankment, accentuating the sharp contrasts in character and appearance. The peaceful, restrained and often tranquil intangible qualities of the public realm, and their contrast with the bustle of the City around it, make a significant contribution to significance and an appreciation of it.

Impact:

446. The Conservation Area lies within the west of the City, where the hustle and bustle of the City and larger commercial buildings reduce in size and scale as you move southwards towards the Embankment from Holborn. As a result there are glimpses of surrounding development beyond the Temples which contrasts with the peaceful, restrained and often tranquil qualities of the Conservation Area thus enhancing the significance and the appreciation of it.

447. The proposed development would see the extension of an existing building that is presently visible from vantage points within the Conservation Area – namely from Kings Bench Walk, Crown Office Row and north western areas of Inner Temple Garden. This would introduce additional height and massing above the roofscape of Kings Bench Walk. Whilst there are existing glimpses of development beyond The Temples from these vantage points, these are presently modest in scale and do not detract or distract from the distinctive enclosed collegiate arrangement.
448. The proposal would result in an additional degree of visual intrusion beyond the roofline of Kings Bench Walk, with a new contemporary materiality that would reduce the amount of open sky and the sense of openness this brings which accentuates the self-contained and distinct integrity and authenticity of the Conservation Area ensemble. However, these impacts would be limited to locations within the east of the Conservation Area which presently do not benefit from a pristine townscape beyond the Temples. The distinct integrity and ensemble of the collegiate arrangement would remain and still clearly be appreciated.
449. Giving consideration to the above, Officers consider that the proposed development would result in a slight degree of less than substantial harm to the setting of the Conservation Area.
450. Historic England have also identified a low degree of harm to the significance of this assets. The consultation response sets out that the proposals *“likely to be visible in views from the neighbouring Temples Conservation Area and would appear on the skyline behind buildings on the east side of King’s Bench Walk. We note that existing developments are visible in the backdrop setting of these buildings in longer views from the west and the previous planning permission did introduce development into this area of sky space. As such, the proposed roof extension will appear on the skyline and will distract from the architectural composition of the buildings in King’s Bench Walk. As such, the proposals are considered to cause a low degree of harm to the significance of the affected heritage assets through development within their setting.”* The consultation response goes on to request that the harm is justified and reduced or minimised as far as possible.
451. The City of London Conservation Area Advisory Committee also raised concerns in relation to the impacts of the proposals on the Temples Conservation Area, stating that *“the Committee expressed reservations about the raised height of the south block in the proposals. Members were concerned about the apparent bulk and horizontal character of the proposal shown in the views from sites on the South Bank, though accepting that the zoom images may have accentuated the harmful effects of the proposals, but were especially concerned by the effects of the proposals in the view*

from the Temple – View 12 in the applicant’s HTVIA – which the applicants Heritage, Townscape and Visual Assessment accepts might do some harm. The Committee considered this to have an adverse effect on the Temple Conservation Area.”

452. Officers are aligned with the views of Historic England and the City of London Conservation Area Advisory Committee in this regard and in response, Officers at the City have requested amendments to the scheme. This has seen the removal of habitable accommodation at the 10th floor and changes to the articulation, colouration and materiality of the roof extension. This is considered to have reduced the impact of the proposals on the Conservation Area with a more subordinate, reduced and subdued appearance achieved via these amendments.

Whitefriars Conservation Area

Significance:

453. The heritage significance of the Whitefriars Conservation Area is covered in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration. It summarises its significance as stemming from:
- An impressive collection of consistently high quality late Victorian / Edwardian commercial and institutional buildings on land reclaimed and comprehensively planned by the Corporation resulting in a more regular grid plan, a rare more formal townscape in a City context, in contrast to the more organic, evolutionary Fleet Street environs which it abuts.
 - The setting of grand Victorian urban infrastructural, engineering and urban planning interventions, namely Blackfriars Bridge, Victoria Embankment and New Bridge Street.
 - An important wider context to the Temples and as foreground to St. Paul’s Cathedral from sensitive riparian views.
 - A varied assortment of land uses including the former Whitefriars friary precincts, domestic tenements, industrial works and commercial HQs in addition to a historical association with the press and newspaper production.
454. The Conservation Area is of a high level of local and even national architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric of the Conservation Area and its archaeology, and to a lesser but significant degree via setting.

Setting:

455. The setting of Whitefriars Area integrates into the urban grain to the North and the Fleet Street Conservation Area with building heights generally

increasing northwards uphill towards Fleet Street creating a layering of modern development in the wider setting.

456. Elements of setting make a substantial contribution to significance, manifesting principally in views across and through the Conservation Area from the River, its embankments and bridges. The main contribution derives from the following in descending order of contribution:
- Strategic pan-London riparian views from Hungerford and Waterloo Bridges and from the South Bank Queen's Walk comprising open river prospects across the City skyline. These make a significant contribution to architectural and historic significance, in particular and an appreciation of it.
 - Views from the immediate environs of the Temples and Fleet Street Conservation Areas, in particular from the Victorian Embankment and south from Fleet Street towards the River which allow for a more enriched appreciation of a wider historic setting. These make a moderate contribution to significance and an appreciation of it.

Impact:

457. The proposed development site is located immediately to the north of the Whitefriars Conservation Area. As such, the proposal would be visible in views within the Conservation Area looking northward along Temple Avenue and Carmelite Street. The proposal would be visible within identified view No.7 (View north up Temple Avenue from the Embankment) as designated within the Whitefriars Conservation Area Character Summary and Management Strategy SPD.
458. There would be no adverse visual impacts arising from the proposals with the existing building lines remaining as existing along the historic street pattern as you look north beyond the Conservation Area retaining the high level of visually permeability achieved through the grid street layout. The additional height would be visible in longer views from the south, but would form part of a further layering of the townscape which reflects the rising topography as one moves northward from the River towards the more commercial areas of the City around Holborn. The proposal therefore is considered to have a neutral impact and therefore would preserve the setting, significance, character and appearance of the conservation area.

Other Designated Heritage Assets

459. 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. These include:

- 24 Tudor Street (Grade II)
- Former Argus Printing Company, 8 – 10 Temple Avenue (Grade II)
- Former Guildhall School of Music, John Carpenter Street (Grade II)
- Carmelite House, 8 Carmelite Street (Grade II)
- Salisbury Square Obelisk (Grade II)
- 2 – 7 Salisbury Court (Grade II)
- 82 – 85 Fleet Street (Grade II)
- 9 – 11 Kings Bench Walk (Grade II)
- 12 – 13 Kings Bench Walk (Grade II)
- Kings Bench Walk Gateway (Grade II)
- Lamp Standards, King’s Bench Walk (Grade II)
- Gates, Piers and Steps, Inner Temple Crown Office Row (Grade II)
- Gateway to Tudor Street, King’s Bench Walk (Grade II)
- Inner Temple Church (Grade I)
- Buttery at Inner Temple Hall (Grade II*)
- 1 & 2 Mitre Court Buildings (Grade II)
- Mitre Court Chambers (Grade II)
- The Masters House, Church Court (Grade II)
- 37 Fleet Street (Grade II*)
- 49 – 50 Fleet Street (Grade II)
- 56 – 57 Fleet Street (Grade II)
- 1 – 3 Wine Office Court (Grade II)
- Church of St Dunstan’s in the West (Grade I)
- Victoria Embankment Wall and Lamp Standards (Grade II)

460. The settings and the contribution they make to the significance of these designated 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.

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

Heritage Conclusion

462. The proposals have been assessed against Local Plan Policies CS12, DM12.1, DM12.2, DM12.3 and DM12.5, draft City Plan 2040 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs.

There has been special regard given to the desirability of preserving The Tipperary Pub, The Remains of the Whitefriars Convent and surrounding listed buildings including their setting and any features of special architectural or historic interest which they possess, under s.16 and s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended. Considerable importance and weight has been attached to and special attention has been paid to the desirability of preserving or enhancing the character or appearance of the Fleet Street Conservation Area under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.

463. In terms of direct Impacts, the harm to the significance of The Tipperary Pub (Grade II) is evaluated at less than substantial at the lowest end of the spectrum due to the erosion of the original floor plan at the rear of the pub. The extent of the alterations is limited to the rear, an area generally considered to be less sensitive change, and would retain the 17th century cellular floor plan and sensitive spaces towards the front of the pub.
464. The proposed development would result in a moderate enhancement to the ability to appreciate the significance of the Remains of the Whitefriars Convent (Grade II) through the works opening up its surrounds to allow for an improved ability to appreciate the asset and facilitate new heritage interpretation and step-free public access to the asset.
465. There would be no harm to the character and appearance of the Fleet Street Conservation Area.
466. Indirectly, the proposals would preserve the significance and contribution of setting of all the aforementioned heritage assets except that of St Brides Church (Grade I); Nos. 2 – 6 Kings Bench Walk (Grade I) and Nos. 3 North King's bench Walk (Grade II*); Inner Temple RHPG (Grade II); and the Temples Conservation Area, which would experience, via setting impacts, low to slight levels of less than substantial harm.
467. Although these harms have been clearly and convincingly justified, and mitigated through good design, the proposal would result in some conflict with Local Plan Policies CS12 (1, 2 and 4), DM12.1 (1 and 4), DM12.3 (2), DM12.5 (1) and CS13 (1 and 2); Emerging City Plan 2040 policies S11 (1 and 2), HE1 (1) and S13 (1 and 2); London Plan Policy HC1 (C) and with the objective set out in Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
468. The proposals comply with policies CS12 (3 and 5), DM12.1 (2, 3 and 5) DM12.2, DM12.3 (1), DM12.4 and CS13 (3); Emerging City Plan 2040 S11 (3-5), S 13 (3), HE1 (2-9) and HE2 and with the objectives set out in Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990.

469. The benefits and harms are considered as part of the paragraph 208 NPPF balancing exercise, and in the final planning balance at the end of this report.
470. Objections on heritage impacts have been received from Historic England and the Gardens Trust. Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus, but some disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

Archaeology

471. 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.
472. The site is located in an area of known archaeology, and previous investigations on the site in the 1920s and 1980s revealed the remains of the medieval Whitefriars priory, as well as Roman and post-medieval remains. The medieval undercroft of the priory, now a listed building, has been preserved within the current development, albeit in a different location to where it was found.
473. An Archaeological Desk Based Assessment accompanied the planning application (MOLA 2024). The Assessment sets out that any potential impacts on any archaeological remains would rise arise from the excavation of new lift pits and pump pits. These works would not affect the archaeological interest of the preserved crypt. Accessibility and visibility of the preserved crypt at the rear of the site would also be enhanced via the proposals.
474. Although some below ground excavations such as lift pits and pump pits are proposed, these will be located within the current basement footprint where archaeological remains have already been removed and are therefore unlikely to have an impact on archaeological remains of significance. The Whitefriars undercroft is to become part of a visitor centre within the site and will therefore be much more accessible to the public. This public benefit is very much welcomed.
475. The Greater London Archaeological Advisory Service (GLAAS) have advised that no below ground excavations are proposed outside the footprint of the current basements, no archaeological mitigation will be necessary.

476. 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.*”
477. 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.

Public Access and Inclusivity

478. 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 2040 and Policy D5 of the London Plan. In addition, the Local Plan Policy DM11.3, draft City Plan and Policy CV3 require high accessibility standards.
479. 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.
480. The City’s Access Officer has reviewed this application and identified a number of areas which require further consideration at a detailed design stage.
481. It is also noted that the proposed development has been reviewed by City of London Access Group (CoLAG) on the 21st of June during pre-application stage.

Arrival at the Site

482. The site is well-served by public transport and including buses from Fleet Street and Farringdon Street, national rail from City Thameslink and

Blackfriars and London underground from Blackfriars. The walking distances from key public transport nodes has not been provided however it is judged to exceed the recommended 50m without a rest. It is therefore recommended that resting points with accessible seating are proposed wherever possible at maximum intervals of 50m along the approaches to the building from key points of arrivals. A travel plan would be secured via a Section 106 agreement to detail how disabled visitors could request support to get to/from this site if required. Further details of the travel plan are set in the Transport and Highways section of this report.

483. Noting that public transport is not accessible to some users, suitable drop-off points are recommended in best practice guidance BS 8300. No specific drop-off points are identified with informal drop-off anticipated along Bouverie Street. The matter will be dealt with through S278 and by condition through the AMP.
484. The existing route between the northern and southern block currently comprises a significant level change between the internal courtyard and Whitefriars Street navigated by a number of steps and is a significant barrier to access for people who require step-free routes. The proposals will provide a lift, which is accessed from Whitefriars Street to create an intuitive step-free route between Whitefriars and Bouverie Street. Further information regarding the lift specification and maintenance will be secured via condition and AMP.
485. It is also welcome that an accessible parking space is proposed on site located at street level directly off Bouverie Street. Further details of management and design of this entry point and Electric Vehicle Charging (EVCP) would be included within an AMP and secured via condition.
486. Continuing provision of the existing on-street Blue Badge spaces in the area during construction is important provided it is safe for use and it is recommended that details are reserved of how this continuous provision will be secured through the Deconstruction and Construction Logistic Plan.

Entrances

487. London Plan D5 requires entrances to be easily identifiable and to allow independent use without separation. All primary entrances to the development would be step free, automated and with a minimum clear opening width of at least 1000mm, further detail is required regarding how this will be achieved within the existing retail unit and will be secured via condition. Further detail will be secured via condition to ensure the design of the manifestation, thresholds, mat wells and floor finishes, and door

furniture are designed to in line with inclusive-design best practice guidance.

488. Double leaf swing doors are proposed to both the primary student accommodation entrance from Bouverie Street and the cultural space accessed from the central courtyard. Providing primary entrances into the building which are easily identifiable and allow everyone to use the entrances independently without additional effort, separation or special treatment.
489. Reception facilities associated with student accommodation and cultural facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2. Routes from the entrance/lobbies should be logical, clearly defined and unobstructed, with adequate and sufficient circulation space. Reception area desks should be positioned away from the entrance to minimise noise, with lowered counter sections, appropriate hearing enhancement systems and the surface of the reception area should be slip resistant. Details would be provided through condition.
490. An Access Management Plan (AMP) for visitors and building users on points of arrival and entrances would be required and would be secured by condition.

Cycle and End of Trip Facilities

491. The long stay cycle parking would be accommodated within the basement and would access via Whitefriars Street through the existing servicing bay. The internal access to the cycle store would be via the servicing ramp or the cycle lift. The internal route from the cycle lift to the cycle store would need to navigate existing columns and concrete wall creating a convoluted route and number of pinch points. Further detail regarding the access route to the cycle store would be secured via condition to ensure that disabling barriers are removed. All gates and doors along the route would be automated sized in accordance with Approved Document M. The Access Advisor has advised that controls should meet best practice guidance as set out in BS 8300 (2) 8.2.3 to be accessible to a range of users.
492. It is noted that 5% of long stay cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1 guidance. Irrespective of the approved drawings, full details of the cycle stand types and the setting out of the cycle store, including swept paths, and end of trip facilities are reserved for condition to ensure these are well-designed and are useable promoting a safe, inclusive and welcoming environment.

Vertical Movement

493. London Plan D5, (B)5 states 'in all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'. 6.2.1 further states that there should be an evacuation lift in addition to fire-fighting lifts. All lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure.
494. All lifts associated with the student accommodation, culture space, crypt, pub and retail will be designed to allow for use in the event of fire to provide a dignified means of escape. Further detail will be secured via condition.
495. The cycle lift would be sized appropriately to provide access to the cycle store in the basement. The detail design would be secured via condition to ensure the lift is designed to accommodate all cycle types, in line with London Cycle Design Standards, including larger recumbent cycles as well as being welcoming and inclusive.
496. Details of the management protocol for people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition.

Horizontal Movement

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

Public Realm and Amenity Terraces

498. The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind.
499. The detailed design for student accommodation terraces, public realm and lower ground amenity associated with the cultural space should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping will be secured by condition, and that details on how the planting specification would be inclusive is provided.

500. The landscape layout will be conditioned to ensure that it is welcoming and inclusive for a wide range of users and provides a variety of seating options for a range of people including recesses for wheelchair users to site alongside other people and a range of seating heights, handrails and backrests.

Student Rooms

501. All rooms would be accessible via step-free routes and 10% of all rooms would be accessible consistent with London Plan Policy H15H.
502. The variety of accessible room types are currently limited to studio rooms only, further detail should be provided regarding how a wider range of accessible room types are provided. To ensure that students have the same level of choice regarding type and quality of room.
503. All accessible rooms would be designed in line with AD M4(3) and would have an entrance door with a minimum clear opening of 850mm with minimum of a 300mm leading edge to the door, a 1100x1700mm wheelchair storage and transfer zone, a 750mm movement route from the point of entry to the openable window, a minimum of 1500mm in front of the kitchenette and ensuite sanitary facilities in line with AD M4(3). Further detail of the room layouts will be secured via condition.
504. The accessible rooms would be prioritised for disabled residents, and there will not be a premium rental cost for these units to disabled residents. Allocation and management of the accessible units is to be secured in the Operational Management Plan as part of the Section 106 agreement.

Student Accommodation Amenity

505. The proposal includes a number of internal amenity spaces all of which should be designed to meet the highest standards of access and inclusion, creating buildings which meet the needs of the existing and future population in line with London Plan D5 3.5.9. Further detail will be secured via condition.

Cultural Spaces

506. The proposal includes cultural space fronting the internal courtyard creating a direct visual link to the public realm. The internal arrangement of the cultural space should be designed to meet the highest standards of access

and inclusion, creating buildings which meet the needs of the existing and future population in line with London Plan D5 3.5.9. Further detail will be secured via a AMP.

507. An end-user has not been secured for the culture use and conditions are recommended to ensure that the cultural offer is inclusive of the greatest range of people at all levels of operation.

Sanitary Facilities

508. Building regulations say that wheelchair users should not have to travel more than 40m to reach sanitary facilities, including any transfer between floors (AD M 2 5.10) and there should be sanitary facilities at the point of entry. This has not currently been demonstrated and further detail is reserved by condition.
509. A mixture of left- and right-hand transfer options should be provided throughout the building to accommodate a wider range of users. Further detail will be secured via condition.

Signage and Wayfinding

510. 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.

Inclusive Procurement and Co-curation

511. An obligation for Inclusive Procurement has been made under the Section 106 including but not limited to opportunities of co-creation / co-curation, partnerships with artists from underrepresented groups, as well as opportunities for volunteering, training and mentoring for underrepresented groups of people.

Access and Inclusivity Conclusion

512. The proposal has been designed to ensure that the site meets the highest standard of inclusive design. In order for the site and all of its proposed uses to full fill their goal of being an inclusive and welcoming place to live, visit and enjoy the highest accessibility standards and inclusive environments practices are essential. Great consideration has been given as to how to improve the public realm and the arrival experience to the building in order to secure the optimal solution for the greatest range of

building users. Subject to further design details and an Access Management Plan, it is considered that the proposal accords with the access related policies outlined above.

513. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above. Therefore, subject to the inclusion of conditions, the development complies with policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2040 and Policy D5 of the London Plan. In addition, the proposals comply with the relevant parts (accessibility) of Local Plan Policy DM11.3, draft City Plan Policy CV3 and Policy H15 of the London Plan.

Cultural and Community Use

514. Local Plan policies CS11 and DM11.2 and draft City Plan 2040 Strategic Policy S6 encourage new cultural experiences and art works. A Cultural Plan has been submitted in accordance with draft City Plan 2040 Strategic Policy S6.
515. The proposal would deliver two elements of cultural community use, comprising cultural space with the intended occupier being the St. Bride's Foundation as well as the opening and curation of the Whitefriar's Crypt at the south of the site.
516. The St. Bride's Foundation space would total c. 1,240m² of floor space across ground floor and lower ground floor levels, with its ground floor entrance on Whitefriars Street. This space will be used to expand their existing activities in the Fleet Street area, with the charity having its sole existing premises at St Bride's Passage to the east of the subject site. The space would have a clear identity, featuring its own dedicated entrance, and would function separately from the student accommodation.
517. The charity itself was established in 1891 and is dedicated to the printworking, typography, design and publishing crafts. The charity currently runs a programme of workshops and design events dedicated to these fields as well hosting a significant archive of books and print-related periodicals as well as a collection of related objects which includes type specimens. The existing premises also houses Bridewell Theatre.
518. This space would be subject to a cultural space implementation plan and management plan which would be secured via s106 alongside its lease at peppercorn rent for a period of 60 years.
519. The Whitefriars Crypt at the south of the site also forms a part of the cultural offer of the proposal. The Crypt would be staffed by security and open to the

public for free, with a visitor's experience available inside including curated displays. This space would be subject to an implementation strategy secured via s106, and concerning matters including planned events and activities, visitor numbers and marketing efforts (including school trips), and opportunities for collaborations and joint-initiatives. The proposed works would also include improvements to the accessibility for the space by all users, including the installation of a platform lift.

520. As such, officers consider that the proposal would be in accordance with Policy CS11 To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy, Policy DM 11.2 Public Art to enhance the City's public realm and distinctive identity.

Highways and Transportation

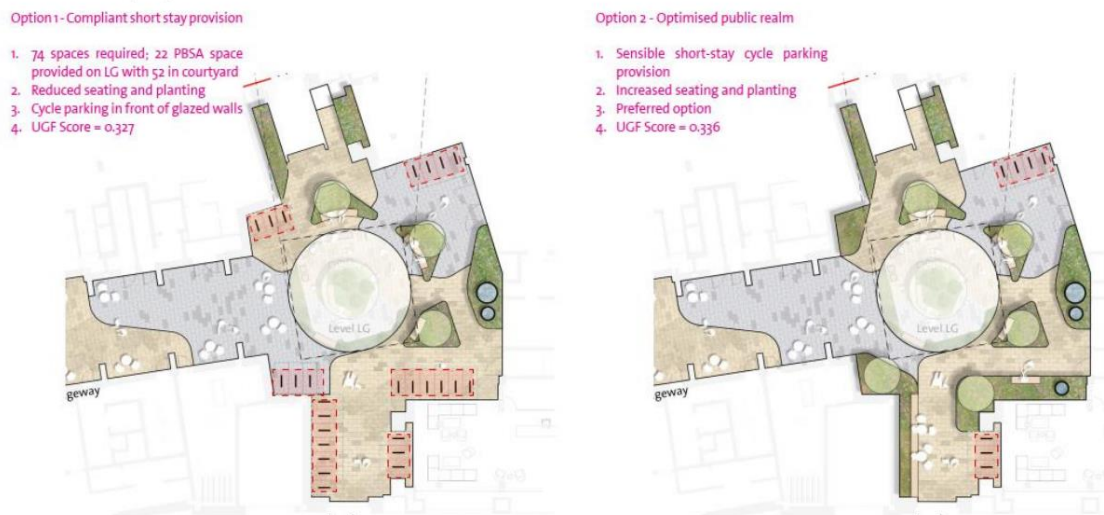
521. A previously consented planning application (Planning ref. 19/00058/FULMAJ) at the Site was to re-provide an office-led scheme with some retail floorspace for the ground and first floors to the north of the building and flexible retail/gym/office uses to the lower ground floor level to both the north and south of the building. The consented scheme was to provide a total of 32,144sqm GIA, an uplift of 1,350 sqm GIA from the existing floor area. The consented scheme has agreement for servicing within the existing service yard and cycle parking within the basement. No car parking spaces were proposed as part of the consented scheme.
522. The application site benefits from being highly accessible by non-car modes, including excellent levels of access to public transport (PTAL rating of 6b) as well as walking and cycling links in the vicinity of the Site. There are well maintained footways connecting the application site and these offer convenient access to the local area, local amenities as well as public transport opportunities such as the bus and rail services.

Cycle Parking

523. 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.

- 524. Regarding existing conditions, a total of 170 cycle spaces are located in the basement of the current proposal site. There are 33 Santander Bike spaces provided on Bouverie Street.
- 525. In terms of proposed development, long-stay student cycle parking will be provided in the basement. The cycle parking store can be accessed via Whitefriars Street existing ramp via the service yard or via the cycle lift.
- 526. The proposal includes a total 653 long stay spaces, 14 of which are enlarged cycle bays also located within the basement.
- 527. 22 Short stay visitor guest space for students are also available in the basement. There are options for the provision of short stay spaces within the courtyard – Option 1 which includes 52 spaces complying with policy and Option 2 – providing 14 of the 52 spaces required for policy compliance. The shortfall should be provided nearby within the public realm, subject to S278 agreement and sign off from CoL officers.
- 528. These options are illustrated in Figure 4.5 below, from the TA. Option 2 offers more opportunities for seating and planting, yet does not comply with policy standards

Figure 4.5: Courtyard Cycle Parking Options



529. A summary table of the cycle parking provision is shown below.

| <u>Use Class</u> | <u>Description</u> | <u>Policy requirement</u> | <u>Long stay</u> | <u>Policy requirement</u> | <u>Short stay</u> |
|------------------|--------------------|---------------------------|------------------|---------------------------|-------------------|
|------------------|--------------------|---------------------------|------------------|---------------------------|-------------------|

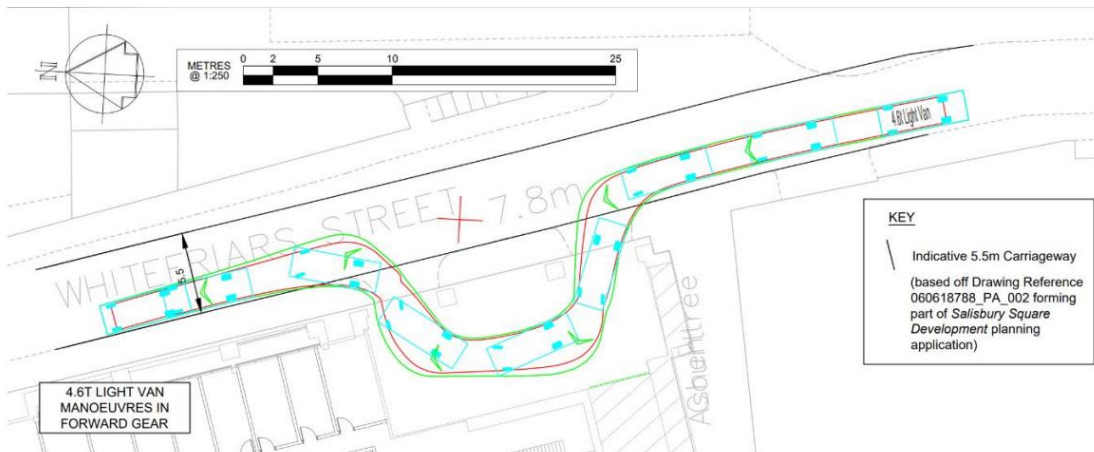
| | | | | | |
|----------|--|--|-----|---|----|
| Class C2 | Student Accommodation (856 rooms) | 0.75 spaces per bedroom | 653 | 1 space per 40 bedrooms | 22 |
| Class D1 | Other, Gallery (1,797sqm GIA) | 1 space per 8 FTE staff | 1 | 1 space per 100 sqm (GEA) | 18 |
| Class A1 | Non-food retail – Café / Bookshop (444sqm GIA) | first 1000 sqm: 1 space per 250 sqm thereafter: 1 space per 1000 sqm (GEA) | 2 | first 1000 sqm: 1 space per 125 sqm; • thereafter: 1 space per 1000 sqm (GEA) | 8 |
| A2-A5 | Drinking Establishment, Pub (517sqm GIA) | 1 space per 175 sqm (GEA) | 3 | 1 space per 20 sqm (GEA) | 26 |
| Total | - | | 659 | | 74 |

530. Should planning permission be granted, the development is required to provide as an obligation, 659 long stay cycle parking spaces and 74 short stay cycle parking spaces for the development.
531. The applicant will be responsible for promoting the use of the cycle parking spaces and as such will be required by Section 106 obligation to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It will be submitted to the City for approval in line with the London Plan Policy T4.
532. In conclusion, the proposed provision is compliant with London Plan cycle parking standards, as the development should look to support users of the site who wish to cycle.

Servicing and Deliveries

533. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2040 Policy VT2 – 1 requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.
534. The service yard has one loading bay accessible via Whitefriars Street. A swept path analysis included in the Transport Assessment (TA), was conducted for vehicles up to 4.6T, which were successfully able to access and egress in forward gear (Figure 3.14).

Figure 3.14: Swept Path Analysis – 4.6t van enters and exits loading bay in forward gear



535. A servicing option within the TA proposed vehicles sized around 7.5T would reverse into the delivery bay, hanging over the public footway. This was demonstrated in the TA (Figure 3.15 below). The City does not support vehicles reversing into the service yard at this location, due to road safety issues and site constraints.

Figure 3.15: Swept Path Analysis – 7.5t box van reverses into loading bay



Source: Pell Frischmann.

536. Servicing within the service yard itself is limited to vehicles no larger than a 7.5T box van and therefore, servicing utilising larger vehicles was initially proposed to be carried out on-street.
537. Further to a wider stakeholder’s consultation it has been established that on-street servicing cannot be considered due to site constraints and security matters to accommodate the upcoming Police base rapid response. The existing parking arrangements and restrictions are being reviewed to cater for such requirements.
538. TfL have also commented on the matter – *“highlighting that London Plan Policy T7 identifies that on street provision is only accepted when off street is not possible and understand that work has been done to prove larger vehicles cannot be accommodated for in the service yard. The TA details*

four options to mitigate on street servicing, including reversing into the servicing yard, weight limits, lengthening and increasing the depth of the servicing yard. All options were discounted.”

539. Therefore, taking the above into consideration, a restriction on the size of vehicles that will carry out servicing and deliveries for the proposed development to ensure they must enter and exit the delivery bay in forward gear will be secured via obligation. The details of the servicing and delivery operations are to be secured by condition.
540. The draft City Plan 2040 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to no servicing at peak times 0700-1000, 1200-1400, and 1600-1900, for all pre-booked deliveries in line with the City of London Transport Strategy. Cargo bikes would be permitted to access the proposed internal off-street servicing area during these times.
541. The development will be required to produce a delivery and servicing plan (DSP), and this would be secured by Section 106 obligation.
542. The development will also be required to produce a Student Welcome Pack, as part of a wider Student Management Plan, both documents secured by Section 106 obligation.
543. These documents will provide further detail must be provided on how the development will manage receiving ad-hoc deliveries such as Amazon and Deliveroo. These deliveries are likely frequently but during off-peak hours, ensuring that these deliveries should be managed and monitored by on-site Facilities Management.
544. Overall, it is not considered that the proposed servicing arrangement would result in any undue implication on the public highway, nor highway safety in general.

Car Parking

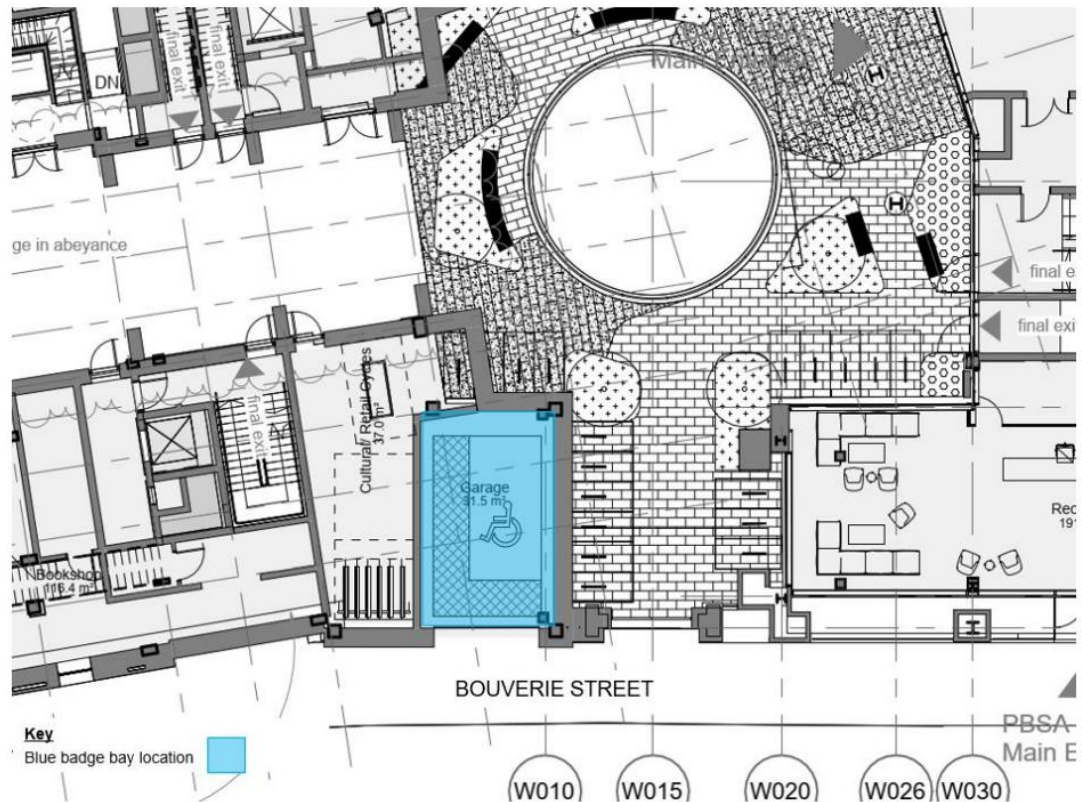
545. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2040 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.
546. London wide policy T6 (Car Parking) requires appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6.1 Residential parking. Section G of this policy outlines the following:

“Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:

- 1. ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset*
- 2. demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage.”*

547. If policy is applied to the quantum’s submitted in the transport scoping report for the provision of 856 bedroom student accommodation, this would mean that the disabled parking requirement for this site would be 26 Disabled Parking bays, to meet London Plan Policy T6 for the student accommodation.
548. The current proposals do not meet the policy requirements for one disabled car parking bay per land use or to accommodate the level of parking required for the student accommodation.
549. Historically, the proposed development site featured 24 car parking spaces within the basement. On the public highway, there are currently two on-street disabled bays on Whitefriars Street. These bays however, are to be relocated as part of the Salisbury Square development to accommodate the needs of the police’s rapid response operations.
550. Policy T6 of the London Plan, sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking. Appropriate disabled persons parking for Blue Badge holders are to be provided in accordance with Policy T6.5 for Non-residential elements of the development.
551. The policy indicates the levels of provisions, to ensure that all non-residential parts of a development provide access to at least one, on or off-street, disabled parking bay.
552. A car-free development has no general parking but still has to provide disabled persons parking, in line with the aforementioned policy. For this development, an on-site designated disabled bay located within Bouverie Street has been proposed. The bay is adjacent to the existing courtyard entrance.
553. The proposed layout (Figure 3.13 from the TA and shown below) has been modified to accommodate an enlarged space; a dropped kerb subject to an agreed vehicle crossover license is required.

Figure 3.13: Blue Badge Bay - Bouverie Street



554. The disabled parking space will be fully managed by facilities management who will provide the necessary support to any future users. Internal discussion amongst CoL officers showed that the disabled parking bay does not fully meet guidance requirements. Compliant on-site disabled parking provision should be secured via planning condition, in order to ensure this disabled parking space can meet the required guidance standards.

Trip Generation

555. A trip generation assessment was undertaken to determine peak hour and daily trips generated by the scheme, comparing forecast trips associated with the proposed development to the existing land uses.
556. The average hourly trip rates used were from 08:00 to 09:00 for the AM peak and 17:00 for the PM peak.
557. The projected future the trip generation and the impact of the new development on the transport network is summarised in the table below below:

| Time | Arrivals | Departures | Total (two-way) |
|---------------|----------|------------|-----------------|
| 08:00 – 09:00 | 9 | 91 | 99 |

| | | | |
|---------------|------|------|------|
| 17:00 – 18:00 | 234 | 124 | 358 |
| Daily | 1570 | 1605 | 3176 |

558. Regarding mode share, the total proposed development is expected to generate 1,808 trips on foot, 1,053 trips by underground/train, 144 by bus, 122 by bicycle and 49 by taxi.

559. Net Trip Generation (Total Proposed trip minus Total Existing Land uses) demonstrates that the proposal will achieve a AM peak net reduction of 507 trips, a PM peak reduction of 411 trips and daily total net trip reduction of 3,412.

| Time | Arrivals | Departures | Total (two-way) |
|---------------|----------|------------|-----------------|
| 08:00 – 09:00 | -560 | 53 | -507 |
| 17:00 – 18:00 | 133 | -545 | -411 |
| Daily | -1794 | -1618 | -3412 |

560. Net mode share can also be found in table 6-20 from the TA below, which describes the net trip reduction by mode. It demonstrates a higher proportion of walking journeys, compared to the trip generation of the previous use - the City supports development which demonstrates higher walking and active mode share.

Table 6-20: Net Mode Share

| Method of Travel | AM Peak (08:00 - 09:00) | | PM Peak (17:00 - 18:00) | | | | Daily | | |
|---------------------|-------------------------|-----------|-------------------------|------------|-------------|-------------|--------------|--------------|--------------|
| | In | Out | In | Out | In | Out | In | Out | Total |
| Underground / Train | -444 | -6 | -450 | 17 | -473 | -455 | -1982 | -1866 | -3847 |
| Bus | -49 | 3 | -45 | 3 | -51 | -48 | -200 | -185 | -385 |
| Taxi | -4 | 1 | -3 | 3 | -3 | 0 | -4 | -3 | -7 |
| Bicycle | -31 | 4 | -28 | 5 | -32 | -28 | -119 | -109 | -228 |
| On foot | -32 | 51 | 19 | 125 | 14 | 120 | 511 | 544 | 1055 |
| Total | -560 | 53 | -507 | 181 | -545 | -411 | -1794 | -1618 | -3412 |

*Any discrepancies (+/-1) are due to rounding.

561. It should be noted that despite the net reduction in trips in the AM & PM peak, as well as the total daily drips, the net trip generation does indicate a net addition of trips between the hours of 19:00 and 24:00. This is due to the assumption that students will be returning to the development later in the evening, a difference between traditional PM peak activity when users return home from work between 17:00 and 19:00.

562. 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 the transport network), it is

considered that this additional level of activity can be accommodated within the highway network.

563. The Applicant has submitted an outline Moving in/out strategy within the Transport Assessment which includes a number of measures to manage and mitigate the impacts on the highway network, including staggering move in and out times. A robust and comprehensive Moving in/out strategy must be secured by 106 through the student management plan with details to be discharged prior to occupation.

564. Trip Generation – delivery and servicing

565. The servicing area for the proposed development will be located off-street via Whitefriars Street. This will be the same arrangement as the current development, with one proposed loading bay to accommodate demand.

566. The proposed servicing trip generation analysis anticipates a total of 86 vehicle trips serving the site per day, including refuse vehicles and facilities management.

567. For clarity, a trip is defined as one movement to or from the proposed site. For example, a parcel delivery by van will count as two trips (arriving and departing).

568. According to a TRICS assessment in the Delivery and Servicing Management Plan (DSP, p17), the total daily trip generation is projected to be 86 trips daily.

569. These trips according to the TA and DSP are unconsolidated therefore, there is potential for these trips to be reduced once consolidation comes into effect.

Public Relam and S278 Agreement

570. The extent of the areas for the highway improvement works (under a Section 278 Agreement) was presented to the applicant. The scope of the works (but not limited to) is set out below and would be secured within the S106 agreement:

Fleet Street

- Resurfacing of the carriageway within the frontage of the site
- Reconstruction of footways as per the City of London's standard materials and City's Healthy Streets proposals
- Reinstatement of street furniture if applicable
- Road Markings and associated traffic orders

- Reinstatement of controlled crossing, associated road markings and infrastructure

Bouverie Street

- Resurfacing of the carriageway within the frontage of the site
- Reconstruction of footways as per the City of London's standard materials.
- Removal of redundant street furniture if applicable (removal and reinstatement) legible London
- Road Markings and associated traffic orders (if applicable)
- Provision of crossover for the provision of disabled bay and accommodation works
- Reinstatement of Santander cycle hire

Whitefriars Street

- Reconstruction of footways as per the City of London's standard materials.

Construction Logistics Plan

571. The submission of a deconstruction logistics plan and construction logistics plan will be secured by condition. The logistics arrangements will be developed in consultation with the City's Highways Licensing and Traffic Management teams to minimise the disruption to neighbouring occupiers and other highway users.

572. Travel Plan

573. In order bring this proposal in line with the policy and address potential requirements for disabled people, a Travel Plan (TP) has been recommended and is to be secured via the Section 106 Agreement.

574. The foundation of the TP is supporting disabled people occupying this development through different measures. Each disabled staff/resident to have a tailored travel plan, on how to get to/from this site, and supported through different initiatives. The foundation of the TP is to support the inclusion of disabled people.

575. Similarly, disabled visitors of this development, could request support to get to/from the site, if the public transport is lacking to meet their needs.

576. Not all London Underground (LU), nearby stations are step-free access, thus some users of this development may require additional support, such

as: arranging a pick up from a nearby LU station which has step-free access or at a pre-arranged location.

577. The TP must also monitor the demand for on-street car parking spaces coming from this development. If records show that demand is higher than the available spaces nearby, the developer will be required to provide additional travel plan measures to support the needs of the disabled users of this development.

Transportation Conclusion

578. Subject to conditions and planning obligations, the proposal would accord with transportation policies including London Plan policies T5 cycle parking, T6 car parking. It accords with the Local Plan 2015 Policy DM3.2, and the draft City Plan 2040 Policies AT1, AT2, AT3, and VT3. The proposals do not accord with DM 16.5 however on balance the proposals are considered acceptable in transport terms.

Waste Collection Arrangements

579. Local Plan policies CS17 and DM17.1 require sustainable choices for waste and for facilities to be integrated into building design. Draft City Plan policies S16 and CE1 requires developments to consider circular economy principles.
580. The Cleansing Team have reviewed the waste collection arrangements and confirmed the proposed waste storage and collection facilities comply with the City's requirements.
581. The waste storage is considered to comply with Local Plan policies CS17 and DM17.1 and draft City Plan policies S16 and CE1.

Environmental Impact of Proposals on Surrounding Area

582. 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. Emerging City Plan 2040 Strategic Policy S8 and Policy DE7 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivers improvements in air quality, open space and views.

-

Wind Microclimate

583. Policies DM10.1 of the Local Plan 2015, Policy S8 of the draft City Plan 2040 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.
584. Computational Fluid testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site.
585. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways, bus stops and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, consisting of five Comfort Categories defining conditions suitable for: frequent sitting /occasional sitting /standing /walking /uncomfortable.
586. Table 4 outlines the various criteria for wind microclimate assessment. Assessments have been carried out for both the Windiest Season and the Summer Season and with surrounding buildings within a 400m radius of the site.

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

Table 4: City of London criteria included in assessment (and taken from the City's Microclimate Guidelines, 2019).

587. The proposed development is a total of 55.465AOD and therefore, the recommended approach in accordance with the Wind Microclimate Guidelines is to carry out one type of testing. For the purposes of this scheme Computational Fluid Dynamics (CFD) simulations or wind tunnel testing should be submitted. Wind microclimate conditions were assessed using high resolution CFD undertaken by GIA. The report is considered to follow an appropriate methodology and are in line with the City of London's Microclimate Guidelines.
588. The following scenarios have been tested:
- Configuration 1: The existing Site with existing surrounding buildings (The Baseline);

- Configuration 2: The Proposed Development with existing surrounding buildings;
 - Configuration 3: The Proposed Development with cumulative schemes (schemes for which planning permission has been granted).
589. The following consented schemes are considered sufficiently advanced to be treated as baseline, and are included in all configurations tested:
- 100 New Bridge Street (22/00748/FULMAJ)
 - Thavies Inn House (21/00885/FULMAJ)
 - 2 - 7 Salisbury Court (20/00998/LBC)
 - 120 Fleet Street (21/00524/LBC & 21/00538/FULEIA)
 - 120 Fleet Street London (21/00538/FULEIA)
 - Peterborough Court (21/00730/FULL)
 - Northcliffe House (20/00581/FULMAJ)
 - Stonecutter Court 1 (18/00878/FULMAJ)
 - 100 And 108 Fetter Lane (21/00534/ FULMAJ)
 - 11 Pilgrim Street (20/00870/FULL)
 - 14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street (21/00755/FULMAJ)
590. The following schemes have also been included as cumulative schemes in Configuration 3.
- 5 Chancery Lane (20/00546/FULMAJ)
 - Hill House (23/01102/FULMAJ).
591. Trees and soft landscaping have not been included in the model, to ensure that conditions represent a reasonable worst-case scenario.
592. The baseline results show that there are no safety or distress exceedances anywhere within the site or surrounding area, with winter conditions ranging between frequent sitting, occasional sitting, standing and walking and summer conditions ranging between frequent sitting, occasional sitting and standing. There are no safety exceedances on any roadways, and all change in conditions are gradual, so conditions are expected to be suitable for cycling. All off-site entrances within the study area will be suitable for either sitting or standing in all seasons, which will be suitable for the intended use and all sensitive receptors are suitable for intended uses.
593. The proposed development with the existing developments demonstrates comfort levels generally the same as the baseline scenario. The results show that with the proposed scheme, there would a slight reduction in windiness to the east of the site on Whitefriars Street and a slight increase in the windiness around the north-west corner of the site on Bouverie Street and Fleet Street. The occasional seating area in the courtyard by the cultural entrance is suitable for a mix of frequent sitting and occasional sitting in summer. The occasional seating areas in the St Bride's churchyard is

suitable for frequent sitting in summer. The occasional seating area to the east of the Salisbury Square Police building suitable for a mix of frequent sitting and occasional sitting in summer. The proposed level 10 amenity terrace is suitable for a mix of occasional sitting and standing in summer, with the majority of the terrace suitable for occasional sitting. There are no instances of strong winds around the Proposed Development and nearby surrounding area.

594. The proposed development with the cumulative schemes results show that the inclusion of the Cumulative Schemes would result in conditions of a consistent level with those seen in Configuration 2. As such, no wind safety risks were identified associated with the proposed development. On-site conditions are suitable for the intended uses without landscaping or mitigation measures for all proposed entrances, ground level amenity and the roof terrace. Off-site conditions were suitable for the intended use (or consistent with the baseline) for all entrances, bus stops, thoroughfares, crossings, ground level amenity and roof terraces. The inclusion of cumulative schemes did not have a material impact on wind conditions.
595. It is considered that the proposed development in all scenarios tested would not result in any wind safety exceedances either at street level or on any amenity terraces within the surveyed radius. All spaces and identified sensitive receptors would remain suitable for their intended uses. There are no safety exceedances on any roadways, and all change in conditions are gradual, so conditions are expected to be suitable for cycling. All offsite entrances within the study area will be suitable for either sitting or standing in all seasons.
596. Therefore, no mitigation measures are required and the development is considered to comply with London Plan Policy D8, Local Plan Policy DM10.1, and Draft City Plan 2040 Policy S8.

Daylight, Sunlight, Overshadowing

597. 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.
598. 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.
599. Draft City Plan Policy DE8 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby

dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces, is appropriate for its context and provides acceptable standards of daylight and sunlight, taking account of the Building Research Establishment's guidelines.

600. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the Draft City Plan 2040 states when considering on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.
601. 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

602. 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

603. 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

604. 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. The impact of the development on the nearby residential properties has been assessed. It is noted that all other non-residential properties in the vicinity of the site are of commercial use, apart from a school to the northwest of the site, that they do not have the same expectation for daylight and sunlight as the domestic properties.
605. 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

606. 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 a working plane. Daylighting will be adversely affected if either the VSC or the NSL guidelines are not met.
607. 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).
608. Both the London Plan 2021 and the draft City Plan 2040 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.
609. 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 agrees with the scope of assessment in terms of the properties selected to be reviewed, as well as the methodology used in the submitted assessments.
610. With regards neighbouring properties and open spaces the submitted assessment has been undertaken using the recommended BRE daylight (VSC, NSL), sunlight (APSH) and overshadowing (SHOG) assessment methodologies. An 'internal' daylight and sunlight report with regards to the proposed student accommodation has also been submitted.
611. The following properties are identified as sensitive receptors within the surrounding area:
- 148 Fleet Street
 - 147 Fleet Street & 7 Hind Court
 - 145 Fleet Street
 - 143-44 Fleet Street
 - 22 Whitefriars Street
 - 24 Tudor Street
 - 62 Fleet Street
 - 61 Fleet Street
 - 59 Fleet Street
612. Since submission, the proposal has been amended so that it has diminished in bulk at the higher levels, described elsewhere in this report, while the daylight and sunlight and overshadowing assessments have not been subsequently updated. Officers consider an update to each of these

technical reports unnecessary as any impacts would be commensurately diminished as a result of the scheme reducing in size. It was agreed with the applicant that the change in room layout also subject to amendments during the application would impact internal daylight and sunlight levels such that a new report would be necessary, and as such an amended assessment was undertaken and submitted. The results have been set out in this report in the following sections.

Daylight and Sunlight - Neighbouring Impacts

613. Concerning commercial properties, the dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. It is not considered that the proposed development would have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in these respects.
614. With regards to overshadowing, while the proposed amenity areas have been tested as described elsewhere in this report, no sensitive receptors were identified in the surrounding area which would necessitate an overshadowing assessment.
615. Properties identified as sensitive receptors in the surrounding area were subject to a two stage assessment, the first stage (Stage 1) identifying where receptors would continue to strictly comply with the BRE Guidelines when considering the impacts of the proposal and the second stage (Stage 2) assessing whether the remaining receptors would face acceptable levels of daylight and sunlight appropriate to their context. Where passing into the second stage of assessment, the report also compares and contrasts the impacts of the proposed against the impacts of the consented scheme at the site (as referred to in the site history section above).
616. Sensitive receptors passing Stage 1 of this assessment are as follows:
- 145 Fleet Street
 - 143-44 Fleet Street
 - 22 Whitefriars Street
 - 24 Tudor Street
 - 59 Fleet Street

617. As the assessment shows that these properties would strictly comply with the BRE Guidelines, they were not subject to further assessment. Receptors then being assessed as Stage 2 are then as follows:
- 148 Fleet Street
 - 147 Fleet Street & 7 Hind Court
 - 61 Fleet Street
 - 62 Fleet Street
618. The assessment of these properties is summarised in the following subsequent paragraphs below.
619. 148 Fleet Street: This property is mixed-use and lies to the north of the site. Residential uses are found on 1st to 4th floors. With regards to strict compliance with the BRE criteria for VSC for daylighting, 12 of 12 windows meet this criteria. When considering the NSL daylight methodology, four of five rooms assessed (80%). The room which does not comply experiences a reduction of 20.9% against a BRE target of 20%. In relation to sunlight, 9 of 12 windows (75%) meet the relevant BRE criteria. During the summer months, these three windows would continue to achieve annual probable sunlight levels above 42% in line with the BRE criteria, while they would experience a 2-5% loss in the winter months against a BRE target value of 5%. When compared to the consented scheme at the site, this is a 3% reduction in winter sunlight hours against the BRE target value of 5%.
620. 147 Fleet Street & 7 Hind Court: This property is mixed-use and lies to the north of the site, with residential uses located across 1st to 4th floors. All four windows tests against the VSC methodology comply with the BRE criteria. NSL assessment has been carried out where floor plans were available, on the 3rd and 4th floors, with one room assessed meeting the BRE Criteria. Of the room which did not meet the BRE criteria with regards to NSL testing, the impact would see an NSL of 20.2% against the BRE target value of 20%, with a high value of NSL retained (78.8%). In relation to sunlight, all four windows considered demonstrate BRE compliance.
621. 61 Fleet Street: This property lies to the west of the subject site, and is a mixed use building including residential uses. Those windows facing the site have been tested, with all meeting the BRE criteria for VSC and APSH. Of the two rooms tested for NSL, one would meet the BRE criteria. The room which would not meet the BRE criteria would experience a change of 21% against the BRE target value of 20%. The applicant's assessment adds that this impact is in line with those resulting from the consented development at the site.
622. 62 Fleet Street: This property lies to the west of the subject site, and is in a mixed-use with residential uses across 1st to 5th floors. 5 of 9 windows meet

the BRE criteria in relation to VSC. Of the remaining four windows, the alterations would be between 20.9% and 22.2% against a BRE target value of 20%. Studio apartments on the 1st and 2nd floors also experience low levels of existing VSC (8.6% and 11.4%) which are reduced to 6.8% and 9%. At 3rd floor level, the tested window would be reduced to 12.6% VSC and the window at 3rd floor level reduced to 17.2% VSC. 1 of 5 windows meet the NSL criteria. Three rooms see alterations between 21% and 29.8% against a BRE target value of 20%, and the remaining studio apartment would experience an NSL alteration of 33.7% with a retained value of 43.8%. 1 of 4 windows meet the BRE criteria for APSH. Two of these windows, at 1st and 2nd floor level, will see annual sunlight levels reduced to from an existing 20% and 27% to 13% and 18% respectively (against a BRE target value of 25%). Turning to winter sunlight, two windows at 2nd and 3rd floor level would see their existing winter sunlight levels reduced from 1% to 0%.

Daylight and Sunlight – Conclusions

623. The scope of the submitted assessment is appropriate, and all nearby relevant buildings have been included in the analysis. Cumulative impacts have not been considered, which is considered appropriate since no other planning applications could be identified in the vicinity of the proposal site. This has been confirmed following third party review. The results of the daylight and sunlight impact assessments are summarised as below:
- 148 Fleet Street – Negligible impact on daylight. Minor adverse impact on sunlight to windows.
 - 147 Fleet Street & 7 Hind Court - Negligible impact on daylight.
 - 61 Fleet Street - Negligible impact on sunlight to windows.
 - 62 Fleet Street - Moderate adverse impacts on daylight. Major adverse impacts on sunlight to windows.
 - 145 Fleet Street - Compliant with BRE targets/guidelines
 - 143-44 Fleet Street - Compliant with BRE targets/guidelines
 - 22 Whitefriars Street - Compliant with BRE targets/guidelines
 - 24 Tudor Street - Compliant with BRE targets/guidelines
 - 59 Fleet Street - Compliant with BRE targets/guidelines
624. The assessment confirms that properties within 62 Fleet Street would be most impacted as a result of the proposal, receiving a moderate adverse impact in terms of daylight and a major adverse impact in terms of sunlight to windows. Considering the existing poor daylighting/sunlighting factors, and the tight knit urban context, although some minor and major adverse impacts have been identified in this case officers consider this to be acceptable overall. Of those minor impacts to 148 Fleet Street, there would be a negligible impact on daylighting while only winter sunlight would be impacted beyond BRE Guideline targets. Concerning the major impacts to 62 Fleet Street, this is described in detail above, while the site would also inherently be impacted more acutely given its close proximity to the subject site. This is also in the context of the other merits of the application, including

the retention of the existing building alongside its optimisation comprising its conversion to student accommodation which would then also provide affordable student housing.

625. Overall, the daylight and sunlight impact of the proposed development on neighbouring properties is considered to be acceptable and in accordance with the requirements of Local Plan Policy DM10.7 and DM21.3

Sunlight to Amenity Spaces

626. 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 by an independent reviewer instructed by the Corporation of the City of London.
627. The BRE guidelines state that for an amenity area to appear adequately sunlit throughout the year, at least half of the area should receive at least two hours of sunlight on 21 March (Spring Equinox). In terms of the overshadowing impact to the proposed communal student amenity spaces, including both external terraces and internal amenity spaces, this is the subject of assessments carried out by GIA and a third party independent review has been undertaken.
628. The external terraces at roof level experience good levels of sunlight, over six hours per day across their entirety, with the BRE Guidelines recommending that a space which receives at least two hours of sunlight per day across half of its areas be considered well-lit.
629. Turning to the internal communal areas, an assessment has not been undertaken concerning those communal spaces at basement level given they have no windows to provide light. These would be expected to be taken up by uses which typically do not require light, including viewing rooms or gym space. A communal amenity space would also be provided at ground floor level which does not meet the BRE Guidelines recommended target.

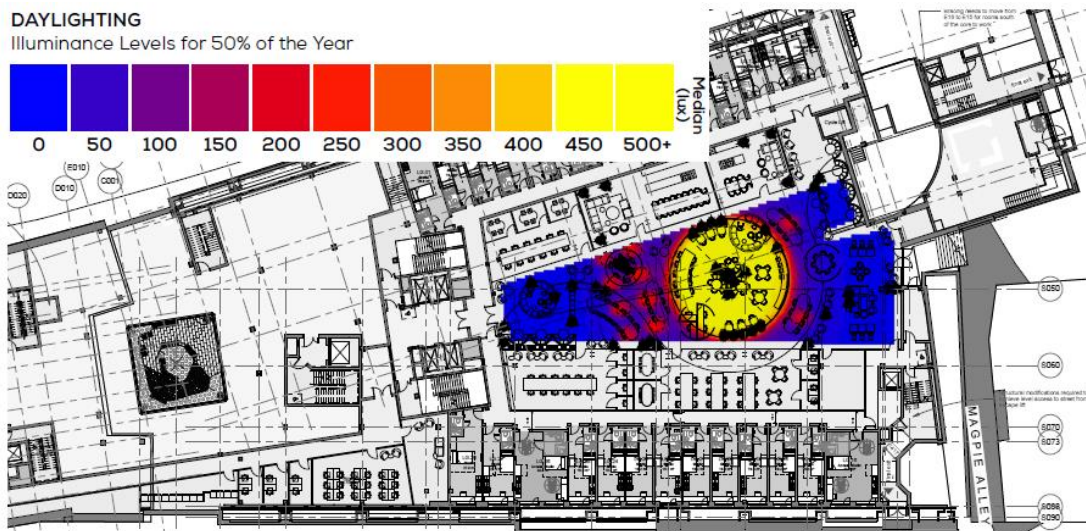


Fig. 03: Median Point Illuminance level within the main Shared Amenity Area at Lower Ground

630. The above figure, taken from the submitted GIA Daylight and Sunlight report, indicates the illuminance levels across half of the year and showing that this space achieves the recommended lux level across 31% of the room. This is below the 50% BRE Guideline target for such a space. The space performs well under the skylight, as would be expected, while the remainder of the space would be reliant on artificial lighting.

Daylight and Sunlight – Internal

631. In terms of amenity for future occupiers, the design of the scheme has sought to optimise the availability of daylight and sunlight while also accommodating the substantial retention of the existing building. The constraints in retaining the existing building include making best use of the existing form of the building, including the central lightwell, while also taking into account the existing envelope and façade structure of the building. The paragraphs below set out the assessment undertaken within the development separated into those rooms within the North Block and those within the South Block.

South Block

632. Concerning daylight, against the BRE Guidance living room target of 150 lux, 40% of the student rooms (317 of 784) achieve said target. When applying the 100 lux bedroom target of 10 lux this increases to 50% compliance (401 of 784). With regards to sunlight, 35% of student rooms (270 of 784) achieve the target of 1.5 hours or more of direct sunlight to a window on 21st March. When considering those rooms only in the new build extension element of the proposal, this compliance rate increases to 81% meeting the 150 lux target and 92 % meeting the 100 lux target, and with 65% of student rooms achieving the target level of exposure to sunlight.

North Block

633. The submitted daylight assessment sets out that the 11% of the student rooms in this block (8 of 72) achieve the 150 lux target, and 32% (23 of 72) meet the 100 lux target. 17% of these 72 student rooms then meet the target of 1.5 hours of direct sunlight exposure to windowpane.

Assessment

634. The compliance of the proposal is broadly similar to, albeit slightly worse than, other proposed purpose-built student accommodation schemes which have come forward in similar urban locations, albeit they have been redevelopment schemes rather than retrofit. The ability of the scheme to provide daylight and sunlight is constrained by the tight knit urban location, restricting its eastern, western and southern elevations, and while the widest streetscape falls to the north this elevation naturally suffers from diminished light. Further to this is the retention of the building which represents a significant design constraint, with daylight and sunlight levels improving in the extended new-build section of the building. When considering these constraints, the design that is proposed has been optimised – making use of internal layout design and the existing lightwell to provide light where possible. In addition, the layout of each room will be secured via condition so those areas of each student room which enjoy the most light will be those areas dedicated to study and recreation.
635. Officers express some concern around the light levels to some of the student rooms and amenity spaces within the proposed development. The majority of the rooms failing to meet the relevant BRE guidance are to rooms on the lower floor levels in particular, those which are north facing, and both the eastern and western elevations are impacted by the tight urban grain of the surrounding streets.
636. Whilst concern remains, Officers consider that the site has been well optimised for its location, has struck the fine balance between daylight distribution and overheating with the variation in window design, and overall consider that the students would experience good levels of amenity with access to a range of internal and external communal spaces that are well lit in parts. This is particularly given the building is being substantially retained, representing a significant design constraint which is then compounded by the existing tight knit urban grain of the surrounding street scene. It is also recommended that the layout of the rooms be optimised and secured by condition to ensure that desks are located in the brightest part of the rooms.
637. Overall, the internal daylight and sunlight of the proposed development considered to be acceptable and in accordance with the requirements of Local Plan Policies DM10.7, DM21.3 and DM21.5, London Plan Policies D3, D6 and H15(A)(5) and Draft City Plan Policy DE7.

Solar Glare

638. Policy D8 of the London Plan, Local Plan policy DM10.1 and draft City Plan 2040 policy DE8 require development to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.
639. The applicant has provided a solar glare assessment within the submission, produced by GIA Surveyors. The report concludes that the design of the facades is unlikely to give rise to a significant solar glare effect to surrounding road users (with viewpoints tested at nearby roads comprising Fleet Street both eastbound and westbound, Pleydell Street approaching Bouverie Street, Eastbound traffic on Temple Lane approaching Bouverie Street, Northbound on Temple Avenue and westbound on Ludgate Hill). Officers agree with this statement. The design of the building incorporates solid façade elements that break up the intensity of the glazing, and the materiality for the solid elements would have relatively low reflectivity. Officers consider that there would not be a high potential for solar glare as a result of the development.
640. 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.

Light Pollution

641. Local Plan Policy DM15.7 and draft City Plan 2040 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.
642. 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 etc) and internal lighting visible from the public realm or which could impact to residential amenity and the environment.

Air Quality

643. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2040 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 and transport of construction materials and waste 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.
644. The City's Air Quality Officer has raised no objection subject to conditions in respect of generators, combustion flues, and Non-Road Mobile Machinery Register. However, it has been raised that the submitted assessment states that no generator is required. As such, the Air Quality Neutral Assessment condition is appended so this can be confirmed in writing.
645. 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 2040 and SI 1 of the London Plan which all seek to improve air quality.

Noise and Vibration

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

649. The Environmental Health team have been consulted and conditions have been included with the recommendation. This includes a condition to restrict the hours of use for the terrace on level 10 between 22:00 and 07:00.
650. Due to there being nearby sensitive receptors it is considered necessary to restrict overnight servicing, therefore a condition will be included to ensure no servicing of the development shall take place between 23:00 and 07:00 Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays.
651. The proposed student accommodation has the potential to increase pedestrian movements around the site at a range of times and therefore potential for noise and disturbance to neighbouring properties. The applicant has submitted an outline Student Management Plan with the application, the details of which would be secured by the condition. The site would benefit from a comprehensive 24/7 management team, including on-site staff such as an accommodation manager, receptionist, cleaning staff and security staff who would be present throughout the day and night. The building would also be served by a comprehensive CCTV system to aid in the management of the building and surrounding spaces. As such, officers consider that adequate management of the development would likely ensure no adverse impacts are caused due to increased pedestrian movements around the site or increased number of users of the building.
652. Overall, subject to conditions, the development should not detrimentally impact on amenity of surrounding properties in respect of noise and disturbance. Therefore, the Proposed Development complies London Plan Policy D13 and D14, Local Plan Policies DM3.5 and DM15.7, and Policies S1 and HL3 of the Draft City Plan.

Health Impact Assessment

653. Policy HL9 of the draft City Plan 2040 requires major developments to submit a rapid Health Impact Assessment to assess potential health impacts resulting from proposed developments.
654. 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”*.
655. The applicants have submitted an HIA using evidence and assessments of impact within documents submitted with the planning application. The

HUDU checklist has been satisfactorily completed and this document sets out that no adverse health impacts are expected to result from the proposed development.

656. An appendix to the HIA has been provided which contains a Primary Health Care Assessment. As the development is targeted at students, it is assumed any impact on local healthcare services would be minimal. The majority of students are expected to register with university affiliated GP's which they are directed to via the university websites. Further to this, a review of GP capacity in the surrounding area is included, with capacity identified at a number of GP surgeries. The HIA states that this identified capacity exceeds the expected impact generated by the proposed development, calculated at 0.5 FTE GP's - a figure not accommodating the percentage of students who would access university-affiliated GP surgeries and health care services, or those who would choose to remain registered with their existing GP.
657. Comments were received from NHS North East ICB stating that the scale of this application means that it will have a significant impact on local health infrastructure. NHS North East ICB expressed that they would request a contribution from the developer to mitigate the impact of the development on health. The applicant has agreed to the one-off contribution, in line with the ICB request.
658. The ICB also raise issues in their response which are addressed elsewhere in this report or via details to be secured by condition. With regards to daylight, this is addressed in paragraphs 597 to 640 of this report, and the performance of the proposal in terms of acoustic insulation would be secured via condition. Turning to emergency vehicle access, the site includes a servicing area which would minimise any conflict between such vehicles and pedestrian movements, in addition to all proposed controls as to parking and servicing then excluding emergency vehicles from such restrictions.
659. In conclusion, potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations, and provides sufficient context which includes identified GP capacity in the surrounding area.

Sustainability

Circular Economy

660. 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 and the emerging City Plan 2024 policy DE1 set out the City's support for circular economy principles.

661. The Site is comprised of two blocks, 'North' and 'South', originally completed in 1989. The two blocks have independent superstructures but are connected at ground and lower ground floor levels. Both blocks are supported on a reinforced concrete (RC) raft foundation.
662. The North block has a RC frame. This building is 5-storey tall and has one level of basement. The roof comprises a steel plant enclosure.
663. The South block is steel framed with concrete rib deck superstructure slabs and a RC basement. The building is 7-storey tall and has two storeys of basement. Where the façade steps in at L04 and L05, steel transfer beams are used to support the columns stepping in.
664. According to the applicant team, the intention for the development has always been to retain as much as possible whilst making the development economically feasible. The proposed structural design approach for both blocks was to avoid foundation enhancement or new foundations, whilst still achieving the required massing and number of floors for densification. Due to the location and limited site space, the financial feasibility of the project also relies on avoiding major substructure works. To achieve these criteria, partial demolition of the top floors and replacing with lightweight structure would be required for load balancing.
665. The design team considered two main approaches for the façade, (1) retain and upgrade to meet current energy efficiency standards or (2) replace the existing façade with a new one. Opportunities and constraints were explored for both approaches.
666. When considering façade retention, key design criteria were flagged such as the need to install cavity barriers (fire protection), requiring significant removal of the existing façade, and the need for internal wall lining to upgrade the thermal performance. Intrusive surveys undertaken at an early stage revealed corrosion to the steel subframe, water ingress and damage to cladding, confirming that significant works would be required to make the façade compliant with current standards.
667. The existing windows require significant maintenance work and are reaching the end of their life so need full replacement in due course. Replacement now, rather than in the future, allows greater flexibility in the ventilation strategy and immediate improvement in acoustic and thermal performance.

Carbon options:

668. A redevelopment options assessment was undertaken following the City's Carbon Options Guidance.

669. Three redevelopment options were investigated:

Option 1 - Refurbishment with minimum development

(baseline scenario)

No structural intervention and assessing the reuse of the existing façade's granite in the proposed façade.

Option 2 - Refurbishment with extension

(maximum achievable extension without demolition of any existing floors)

South block 2 new floors, North block 1 new floor.

Complete replacement of facades without any granite reuse.

Option 3 - Refurbishment with major extension

(maximise new floor area with minimal strengthening of existing structure)

Demolition of upper slabs and new additional storeys

- South block - 2 top slabs demolished, 6 new floors
- North block - 1 slab demolished, 3 new floors

Complete replacement of facades without any granite reuse.

| Retention rates | Option 1 | Option 2 | Option 3 |
|--|--|--|--|
| Substructure retained by mass | 100% | 100% | 100% |
| Superstructure retained by mass <i>(frame, upper floors, roof, stairs, ramps)</i> | North block 100% South block 100% | North block 93% South block 87% | North block 80% South block 70% |
| Superstructure retained by area <i>(external walls, windows, ext. doors)</i> | 0% | 0% | 0% |

670. Total upfront embodied carbon for Option 3 is 34% higher than Option 1 and 12% higher than Option 2. Total WLC for Option 3 is 24% higher than Option 1 and 9% higher than Option 2. A significant factor in the increase of carbon is attributable to the increase in floor area. Option 3 provides 19% increase in NIA over Option 1 and 9% over Option 2.

671. All options include a high level of retention of sub and superstructure. Retention of the existing south block facade is not possible for any of the options due to its poor condition (corrosion to steel subframe, damage to cladding, failed double glazing units, no cavity barriers, areas of missing insulation) but areas of stone tiles are planned for reuse. The amount of extension has been designed to work with the loading capacity of the

existing sub/superstructure thereby minimising any strengthening works and the associated carbon. Due to changes at roof level Options 2 and 3 are able to offer a significant increase in greening and outdoor amenity space delivered in the proposed scheme. However, only Option 3 was deemed economically viable by the applicant due to the increase in floor area / no. of bedrooms achievable. It is Option 3 which forms the basis for the proposed development. Acknowledging the level of retention and efforts to minimise structural intervention along with the improved amenity and increased site density Options 2 and 3 can be recommended.

Development proposal

672. As outlined above, the development proposal would see the demolition of upper slabs to allow for a lighter weight vertical extension;

South block - 2 top slabs demolished, addition of 6 new floors

North block - 1 slab demolished and the addition of 3 new floors

673. At least 80% of the superstructure of the North Building and 70% of the superstructure of the South Building would be reused including complete reuse of the substructure for both buildings.

674. The design team assessed the feasibility of different structural floor options for the (lightweight) extension areas. A lightweight steel frame joisted slab with timber deck was chosen. This option was the second lowest in terms of embodied carbon; a solid CLT slab would have been lower, but this option was ruled out due to fire safety and cost challenges.

675. In April 2020, planning permission was granted for extension and façade changes to deliver an office use under a different applicant. That scheme was abandoned in 2023. Strip out works were undertaken as part of enabling works of the extant scheme prior to the current applicant's ownership of the building. This means there was no significant opportunity to review reuse of building interior items, such as services, raised access floors, finishes and ceilings etc.

676. A Circular Economy Statement was submitted as part of the planning application and includes a detailed pre-demolition audit, conducted by a specialist waste contractor. The pre-demolition audit assessed the materials predicted to arise from demolition/deconstruction works, identified the key demolition products (KDPs) and outlines a range of suitable strategies and specialist contractors for reuse/recycling. The audit recommends a target of 12% (by weight) of materials should be reused.

677. Deconstruction will be prioritised over demolition for elements with the highest reuse feasibility/value including granite cladding and steel sections

from areas of the building being removed/reconfigured (upper floors, plant area). The granite cladding tiles are generally in good condition and should hold aesthetic and financial value if removed intact. They could also be used for terrazzo tiling if unable to be removed intact. Currently an allowance of approx. 436m² is allocated for ground floor façade with repurposed granite.

678. Additional opportunities with the highest potential carbon impact as set out in the Circular Economy Tracker include:
- Procurement of steel (rebar/sections) including higher recycled/reused content
 - Reuse of steel beams and columns from demolition on existing site
 - Use of aluminium windows including post-consumer recycled content
 - Stuff layer
 - Prioritise manufacturers that can provide products with higher recycled content
 - Prioritise furniture from second-hand market
679. The pre-demolition audit also provides recommendations on how to maximise reuse of salvaged materials including:
- As long a lead-in time as possible and maximum exposure are required
 - Assess potentially for reuse by the same client locally
 - Sell or give away locally
 - Consider setting aside storage on site for segregation of salvaged items.
 - Working with the design team for the new development, consider any options for direct onsite reuse
 - Consider options for reuse of items in any other nearby planned projects.
 - Advertise as available to local organisations
 - Advertise more widely via virtual exchange platforms
680. Exploration of these opportunities is secured via condition, addressing a further pre-demolition audit submission and the submission of a detailed Circular Economy Statement.
681. The project targets for excavation, demolition, construction and operational waste all match, as a minimum, those set out in Policy SI 7 of the London Plan.
682. The Circular Economy Statement outlines the key targets and commitments of implementing circular economy principles in the proposed development. Some of the key measures proposed to address circular economy principles are:

Designing out Waste

- High level of retention of the existing sub-structure and super structure
- Reuse of existing granite

- Potential reuse of existing steel
- Prioritising suppliers with takeback schemes

Adaptability

- The proposed structural strategy for the new floors promotes adaptability if the development is to be retained and refurbished in the future. However, there are limitations of withstanding heavy loads
- The façade design will suit future change of use. The enhanced design performance of the façade allows for future change of use.

Flexibility

- The plant currently located on the roof of the South Building will be relocated to the basement allowing for greater flexibility in the design of the roof.
- The existing floors are being reused and are flexible to the needs of the building.

Replaceability / Disassembly

- The design of the new floors will aim to implement the ‘building in layers’ approach, to allow different elements to be replaced whilst maintenance and will use mechanical fixings for the main structure.
- Decentralised HVAC systems to include localised MVHR systems and smaller HVRF Systems which allows for ease in future replacement.

683. **Operational energy:**

- London Plan Policy SI 2 requires major development to be net zero-carbon, with a minimum reduction in regulated emissions (i.e. those associated with heating, cooling, ventilation, hot-water and lighting) of 35 per cent beyond Part L of the Building Regulations. Non-residential developments should target a 15% reduction in CO₂ emissions, through energy efficiency measures (Be lean stage) alone. Following all stages, the combined measures are expected to reduce the regulated operational carbon emissions by 32% compared to a Part L 2021 compliant building.

Operational energy reduction for the proposed development

| Modelled floor area (m ²) | 31,495 | | |
|---------------------------------------|----------------------------------|-----------------|----------------------------|
| | Tonnes CO ₂ per annum | Stage reduction | Stage percentage reduction |
| Baseline (Part L 2021) | 117.5 | N/A | N/A |
| Be Lean: Demand reduction | 113.1 | 4.4 | 4% |
| Be Clean: Decentralised energy | 113.1 | 0.0 | 0% |

| | | | |
|---|------|------|-----|
| Be Green: Low/zero carbon technologies | 79.4 | 33.7 | 29% |
| Total reduction | - | 38.1 | 32% |

684. The design includes several measures to reduce the energy demand and operational carbon emissions, in line with the Energy hierarchy set out in the GLA Energy Assessment Guidance 2022 which are set out below.

Be Lean

The key 'Be Lean' strategies include:

- a high-performance façade design that optimises glazing ratios (façade is 22% glazing) and performance based on orientation to maximise solar gain, natural daylight, and external views. All glazing will be specified with an improved SHGC (solar heat gain coefficient) to minimise heat gain and risk of overheating.
- Building services optimised for efficiency, focusing on lighting, hot water systems, and fan energy.
- All services pipework, valves, fittings and ductwork will be insulated and distribution routes designed (particularly avoiding lateral pipe runs in living areas) to minimise unwanted heat loss or heat gain.
- Passive/mixed mode ventilation is incorporated for storeys level 5 and upwards (where external noise levels are considered suitable). Ventilation systems will incorporate heat recovery.
- It is proposed that a Building Energy Management System (BEMS) is installed to monitor, control and sequence key mechanical and electrical plant.
- An energy saving key card switch will be installed within each guestroom to control the lighting circuit and ensure that energy is not being wasted when rooms are unoccupied.

Waste Water Heat Recovery was considered but ruled out following assessment of another scheme installed by the energy consultant where results demonstrated that the energy, carbon and cost savings did not provide any substantial benefit, when compared against the increased installation and maintenance costs.

A 4% reduction is achieved compared to Part L at be lean stage, which fails to meet the GLA's recommended target of 15% (non-residential development).

Be Clean

According to the London Heat Map Tool, there is no existing or proposed communal or district heating scheme in close proximity to the site at this time. This was confirmed through correspondence with Eon.

Space and pipework allowance has been allocated within the basement, should a district heat network be available in the future. A full connection strategy will be developed post concept design.

Be Green

The key 'Be Green' measures proposed include the use of highly efficient air source heat pumps for heating, cooling and hot water and a 679m² array of roof level photovoltaic panels predicted to generate 92,422 kWh/year.

The proposed development will be fully electric in operation with the exception of the emergency generators.

EUI

Energy Use Intensity (EUI) is a measure of the total energy consumed in a building annually. It includes both regulated (fixed systems for lighting, heating, hot water, air conditioning and mechanical ventilation) and unregulated (cooking and all electrical appliances, and other small power) energy.

The estimated whole building EUI for the proposed development is 65.9 kWh/m²/year (GIA), which indicates a very high level of energy efficiency, although it is above the GLA target of 55 kWh/m²/year.

The estimated space heating demand is 9 kWh/m²/year (GIA), which is below the GLA target of 15 kWh/m²/year.

Whole Lifecycle carbon:

685. The following carbon reduction measures have been incorporated into the proposed design:
- Retention of the existing structures of both the North and South Blocks
 - Vertical extension (removal and new structure) optimised to keep strengthening of existing sub/superstructure to the minimum possible.
 - Optimisation of duct and pipe runs
 - Change of cladding at upper levels from zinc to PPC aluminium
 - Offsite manufacturing of shower room pods (which minimises material use/waste)
686. The carbon reduction opportunities identified in the applicant team's reduction strategy which will be explored in the further design phases include:
- Optimise design and specification of materials (steel, concrete, internal partitions)
 - Investigate suitability/availability of reclaimed steel sections. Reuse of existing steel sections to be demolished. Investigations into the availability of off-site reclaimed steel to be conducted at time of procurement.
 - Commit to higher proportions of steel produced using electric furnaces rather than fossil fuel furnaces (linked to availability and subject to cost approval)
 - Procure materials locally (concrete, reinforcing steel etc)

- Procure materials covered by EPD certification
- Concrete specifications and optimisation of cement content / use of cement replacement
- Specification of low-carbon aluminium façade elements
- Optimisation of supply chain for prefabricated precast concrete façade bays
- Optimise design and specification of MEP systems including refrigerant
- Explore reusability of existing lift cars
- Efficient design/reduction in quantity of fitted furniture in bedrooms

687. The following table shows the whole life-cycle carbon emissions of the proposed scheme compared to the GLA benchmarks (residential benchmarks, as no student accommodation benchmarks are available):

Whole life-cycle carbon emissions by stage and compared to GLA benchmarks

| Stages | Lifecycle Carbon Emissions (tCO ₂ e) | Carbon Intensity (kgCO ₂ e/m ² GIA) | | |
|---|---|---|-------------------------|------------------------------|
| | | Development proposal carbon intensity | GLA standard benchmark* | GLA aspirational benchmark * |
| Upfront Embodied carbon (A1-A5) | 22,217 | 633 | 850 | 500 |
| In-use & End-of-Life Embodied carbon (B-C, exc. B6-B7) | 23,324 | 655 | 350 | 300 |
| In-use Operational carbon | 8,263 | 236 | n/a | n/a |
| Lifecycle Embodied Carbon (A-C, excl. B6-B7, incl. sequestration) | 43,026 | 1,226 | 1200 | 800 |
| Whole lifecycle carbon (A-C, incl. B6-B7 inc. sequestration) | 51,289 | 1,462 | n/a | n/a |

**GLA Residential benchmarks*

688. Total WLC emissions of the proposed development over a 60-year period are estimated to be 51,289 tCO₂e (1,462 kgCO₂e/m²GIA). The Upfront Embodied Carbon (A1-A5) accounts for 43% total whole life carbon

emissions. Operational emissions are calculated at 8,263 tCO₂e (236 kgCO₂e/m²_{GIA}), equating to 16% of whole life carbon emissions.

689. After the submission of the application, limited changes to the form and massing have been made following negotiations with Planning Officers. The primary changes are the loss of all 15 bedrooms from the 10th floor (plant and circulation spaces remain at 10th floor) and a 2m step back on the 9th floor of the south block's south façade. The total floor area has been reduced by 355m², just 1% of the total area. These changes will be reflected in a WLCA which will be conducted during Stage 4 technical design phase. As the floor area / massing has decreased, a positive effect on carbon emissions would be expected resulting from this change in massing. Stage 4 and post-completion WLCAs will be secured by condition.
690. The upfront embodied carbon (A1-A5) estimated at planning stage (Stage 2) is approx. 633 kgCO₂e/m²_{GIA}, well below the GLA standard benchmark but exceeding (+23%) the GLA aspirational benchmark (500 kgCO₂e/m²_{GIA}).
691. The life-cycle embodied carbon (A-C, excluding B6-B7) is estimated at 1,226 kgCO₂e/m²_{GIA}, only exceeding the GLA standard benchmark (1200 kgCO₂e/m²_{GIA}) by 2.1%.

BREEAM

692. Emerging City Plan Policy DE1 requires major developments to achieve a minimum BREEAM rating of 'Excellent' and to aim for 'Outstanding'. A BREEAM pre-assessment has been carried out (under the BREEAM NC v6.1 New Construction scheme for a fully fitted development.) which indicates a target score of 79.32%, exceeding the threshold for 'Excellent' (70%) and falling just below the threshold for 'Outstanding' (80%). The potential score given at pre-assessment stage is 91.9%. The development achieves a moderate to high number of credits in the City's priority areas of Water, Waste, Pollution and Materials. The development falls slightly short in the Energy category. This is in part due to credits for free cooling not being achieved as areas of the building are not suitable for natural cooling due to noise limitations. The Wst 05 credit – Adaptation to Climate Change is targeted as required by the Local Plan.
693. The target rating meets the existing Local Plan Policy CS15 and the emerging City Plan 2040 policy requirement. The applicant should explore options to achieve 'Outstanding' based on the pre-assessment. A post completion assessment is secured by condition.

Urban Greening and Biodiversity

694. Local Plan Policies DM10.2 (Design of green roofs and walls) and DM19.2 (Biodiversity and Urban Greening) as well as the emerging City Plan 2040 policies OS2 (Urban Greening) and OS3 (Biodiversity) encourage the inclusion urban greening such as green roofs and walls. Planting would provide a green and attractive setting and roof terraces offers important amenity spaces for occupiers of the building. The proposed greening accords with the local plan policies.
695. The development proposal includes the following greening and biodiversity measures:
- Extensive green and intensive brown roofs namely at ground floor and levels 7-11
 - Level 10 has a terrace that incorporates seating areas and planting, including raised planters and specimen trees, climbing plants on pergolas
 - The public realm incorporates intensive raised planters and standard specimen trees. The raised planters will be seeded with shade tolerant planting owing to their location. Seating will be incorporated into the raised planters
 - Shade and climate resilient planting,
696. The site currently features minimal vegetation and a biodiversity unit score of 0. As such, the proposal will offer a significant increase in the site's offering. With the site designated as primarily residential the GLA's recommended target UGF score is 0.4. Whilst the target of 0.4 is not possible due to the retention of the existing building and balancing the proposed works in a sustainable manner, all opportunities for greening have been explored. The design offers tree, shrub and herbaceous planting, as well as a biodiverse roof alongside the mechanical & plant requirements. The design has sought to maximise planting and biodiversity by providing an intensive brown roof at Ground Floor level (in the south block internal atrium) and Levels 08-11. Green roofs are proposed on the lift over runs. Biodiverse shade and drought planting has been proposed in raised planters to the Ground, Lower Ground Floors and PBSA Terraces. Trellis climbers have been omitted to facades because of potential combustible materials located on the facade. Climbers have been introduced to pergolas away from facades on the L10 PBSA terrace in lieu. Overall the proposal achieves a score of 0.305. Plans have been submitted, indicating the location and size of proposed greening in additional amended received plans on the 8th October 2024
697. Details of the quality, species, irrigation and maintenance of the proposed urban greening are required by condition.

698. As such, officers are satisfied that urban greening has been maximised on site and that due to offsite contributions and 278 works, in this instance, a deficiency under the minimum target is acceptable.
699. An Ecological Appraisal was undertaken by the sustainability consultant following Statutory assessment requirements. With the proposed greening, the development achieves a Biodiversity Habitat Units score of 0.47. This equates to 3.13 biodiversity units per hectare meeting the emerging City Plan target of 3 BU/ha. (Policy OS4: Biodiversity Net Gain). As the existing biodiversity score is 0 it is not possible to report a percentage improvement.
700. The Ecology Appraisal includes a section on Management Recommendations which the consultant advises, "should be adopted as part of a Landscape and Ecology Management Plan (LEMP)". Details and drawings of the final landscaping design and a LEMP will be secured by conditions.

Climate Resilience

Overheating

701. Overheating in mixed use developments can be a problem if it is not dealt with at design stage. The PBSA and commercial areas (retail and coworking) have been assessed in accordance with the appropriate technical guidance (CIBSE TM52) with consideration for current, and future weather files. The detailed overheating assessment demonstrates that the design is compliant for current weather conditions but shows some areas as non-compliant against future weather files. A mitigation strategy to enable compliance and adaptability to future climates will be addressed during detailed design phase. The mitigation strategy will be secured by condition.
702. Due to the enhanced performance of the building fabric, external heat gains are reduced, however having less 'leaky' buildings, means that removal of internal heat gains becomes more difficult. Cooling demand will be minimised through passive measures. Active cooling would be provided by high efficiency ASHPs when required.
703. Solutions already incorporated to minimise internal heat gains include use of LED lighting, and vertical distribution of hot water services to mitigate heat gains into internal circulation spaces.
704. The solar shading, and passive design measures will be considered in more detail at the next stage of the design. Additional passive measures, such as external blinds, internal fans, additional shading will be provided as required to ensure spaces remain comfortable in the future. The submission of

detailed information on the solar shading, and passive design measures proposed will be required by pre-commencement condition.

705. Water resources

706. Water efficient/low flow fixtures and appliances will be specified to minimise water use. 8 out of 10 BREEAM water credits are targeted demonstrating commitment to efficient water use.

707. Rainwater harvesting is proposed in the form of a combined rainwater recycling and surface water attenuation tank.

Flooding and Sustainable Drainage

708. A flood risk assessment has been conducted by a specialist contractor. The site is considered to have a very low probability of flooding from all sources. The surface water drainage strategy considers surface water runoff management, and the solution proposed ensures flood prevention against a 1–100-year rainfall event plus 40% climate change allowance event. Sustainable drainage systems include green roofs, rainwater recycling and attenuation tank. Green roofs and planters will reduce run off rate and improve water quality whilst flow control measures from the attenuation tank to the combined sewer will reduce runoff rates to greenfield runoff rates. Thames Water are satisfied with the waste water discharge strategy.

Sustainability Conclusion

709. The development proposal makes highly effective use of a currently unoccupied building, increasing density whilst avoiding extensive demolition and minimising carbon emissions, very nearly achieving the GLA standard target for whole life carbon (exceeding by 2%). The development proposal retains 100% of the substructure for both buildings, 80% of the superstructure of the North Building and 70% of the superstructure of the South Building. The lightweight floors of the vertical extension have been designed to work with the loading capacity of the existing sub/superstructures thereby minimising any strengthening works and the associated carbon. 436m² of granite cladding is also proposed for deconstruction and reuse in the new façade.

710. The development proposal will be fully electric, making use of highly efficient air source heat pumps for heating, cooling and hot water demand. Mixed mode ventilation (passive and active) has been incorporated, to all areas where possible, to reduce emissions associated with cooling. Occupants have control over openable louvred panels or windows to influence the amount of natural air flow. The development achieves a 32% improvement over Part L 2021 which currently constitutes above average carbon

emission savings for major development in the City. The energy use intensity (EUI) of 65kWh/m²/yr is lower than average for major development in the City.

711. Urban greening of varied aesthetic and biodiversity is provided at ground level including the public courtyard and covering a large area of the roof top terrace. The development achieves the emerging City Plan Policy target of 3 biodiversity units per hectare.
712. The development offers increased resistance to climate risks through the management and attenuation of water, with rainwater recycled for greywater uses and through the significantly increased greening which helps to reduce the urban heat island effects.
713. Overall the proposal offers high-quality efficient student accommodation and amenities with significant new greening and biodiversity. The environmental impact of construction and maintenance has been minimised through high levels of retentions and considerate design which prioritises retrofit, reuses materials and designing out waste. The replacement of the dilapidated façade and MEP equipment with highly efficient new systems as proposed would achieve excellent operational performance. The proposal demonstrates concerted efforts to address the key issues of prioritising retrofit over demolition, minimising embodied and operational carbon emissions and improving greening and biodiversity with further design improvements proposed for investigation at detailed design stage. Evidence of design improvements achieved will be secured through conditions.

Fire Safety

714. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage. Policy D5 requires development to incorporate safe and dignified emergency evacuation for all building users with a minimum of one lift per core to be a suitably sized fire evacuation lift.
715. The application is accompanied by a fire safety statement which demonstrates how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.
716. The Health and Safety Executive (HSE), who are the statutory respondent in relation to fire safety on development of this nature, have been consulted on this application and are satisfied with the information provided within the application, including the submitted Fire Statement. This would be subject

to carrying out and verification of CFD modelling and either the confirmation that an existing hydrant is operational or that an application is made for an operational hydrant to be installed. Both of these matters are raised in the submitted Fire Statement, and would be subject to review by the HSE and a future regulatory stage. Informatives would be attached to the permission highlighting these matters.

- 717. The District Surveyors have reviewed this application and raise no objection on the ground that the HSE have reviewed and are satisfied with the proposal.
- 718. The proposed development would therefore meet the requirements of Policy D5 and D12 of the London Plan.

Suicide Prevention Measures

- 719. Local Plan policy CS3 requires that security and safety measures are of an appropriate high-quality design. Draft City Plan Policy DE5 requires security and safety to be considered. The City recently adopted the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) which requires suicide prevention and safety measures to be considered and incorporated where necessary.
- 720. The proposed roof terrace and external amenity space at roof top level would have general characteristics which passively improve the safety and suicide prevention credentials of these areas – including centralising the spaces so that there are buffers before each edge, and the tiered design of the crown of the building which precludes a sheer drop. Further detailed design of the roof terrace space would be secured via condition, specific to suicide prevention and safety. The condition would require the submission of further details prior to occupation addressed safety and suicide prevention as it relates to balustrading, barrier treatment of each edge, treatment of the lightwell, lighting strategy as it relates to night time use of the terrace, the affixation of furniture, CCTV and surveillance strategy, and staff training.
- 721. The proposal is considered to comply with Local Plan Policy CS3 and draft City Plan Policy DE5 and the recommendations of the Planning Advice Note.

Flood Risk and Sustainable Urban Drainage

- 722. Local Plan 2015 policy CS18 seeks to “reduce the risk of flooding from surface water throughout the City, by ensuring the development proposals minimise water use, reduce demands on the combined surface water sewer

and sewerage network". The use of Sustainable Drainage Systems (SuDS) is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan 2040.

- 723. The submitted Flood Risk Assessment identifies the site as lying in Flood Zone 1 (an area of very low flood risk) as such it is at a low risk of fluvial and tidal flooding.
- 724. The proposed drainage strategy includes capturing some runoff from the proposed building using a green roof and brown roof on the north and south blocks to limit the overall volume of water run-off that needs to be discharged and an attenuation tank below ground level.
- 725. The proposed Flood Risk and SUDS strategy would accord with policies CS18 of the Local Plan 2015, S15, CR2 and CR3 of the draft City Plan 2040 and policies S112 of the London Plan.

Assessment of Public Benefits and the NPPF Paragraph 208 Balancing Exercise

- 726. When addressing the balancing exercise, the heritage harm as outlined is afforded considerable importance and great weight in line with the NPPF. The more important the asset, the greater the weight should be given to the asset's conservation and in this case there are multiple designations, The Tipperary Pub and the Remains of Former Whitefriars Convent are Grade II Listed Buildings whilst the northern block of the site is located within the Fleet Street Conservation Area.
- 727. 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." Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF. The Planning Practice Guidance provides that public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit.
- 728. When carrying out the NPPF Paragraph 208 balancing exercise in relation to the less than substantial harm to The Tipperary Pub, consideration importance and weight must be given to the desirability of preserving the building and its setting. This is also the case to the moderate enhancement to the Remains of the Former Whitefriars Convent.

729. When considering the listed building consent application, the duty imposed by section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies and in considering whether to grant listed building consent special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
730. Under Section 16 and Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special regard must be had to the desirability of preserving the settings of the aforementioned listed buildings, and under Section 72 of the same Act, special attention paid to the desirability of preserving or enhancing the character or appearance of the Fleet Street Conservation Area.
731. The proposal would result in less than substantial harm via indirect setting impacts to the significance of the below listed buildings, a Registered Historic Park and Garden and a Conservation Area, as follows:
- St Bride's Church (Grade I) – low level of less than substantial harm through the proposal's slight erosion of its sky silhouette in the view from Waterloo Bridge.
 - Nos. 2-6 Kings Bench Walk (all Grade I) – low level of less than substantial harm through the proposals background presence in views of the sensitive group arrangement of these buildings.
 - No. 3 North Kings Bench Walk (Grade II*) - low level of less than substantial harm through the proposals background presence in views of the sensitive group arrangement of these buildings.
 - Inner Temple Registered Historic Park and Garden (Grade II) – slight level of less than substantial harm through the proposals background presence in views from the garden.
 - Temples Conservation Area - slight level of less than substantial harm through the proposals background presence in views from the Conservation Area.
- And via direct impact to:
- The Tipperary Pub (II) – low level of less than substantial harm due to loss floor plan and the rear wall and lightwell.
732. Given the proposal would result in harm to the significance of a Conservation Area, a Registered Historic Park and Garden and of listed buildings, including Grade I listed buildings, there is a strong presumption against the grant of planning permission. Notwithstanding, that presumption is capable of being rebutted via wider public benefits.
733. The key benefits that are considered to flow from the proposal are set out below:
734. The following **Economic** benefits that are considered to arise:

- The provision of 856 student accommodation rooms, will introduce a new student audience and increase visitors into the area, supporting the growth of the higher education sector in the Square Mile as well as drive expenditure within this part of the City supporting local businesses and services.
- The provision of 1503 sqm of cultural / educational uses across multiple levels of the site including enhanced step-free public access to archaeological remains would drive footfall and further increase spend in the City as well as provide leisure and educational opportunities for the wellbeing of workers, residents and visitors.
- The enhanced public realm and wayfinding combined with the cultural offer would drive footfall through the site during the day, evenings and weekends. It would contribute to the emerging 21st century Fleet Street further enriching its distinct character with fresh attractions. Occupiers on site and in the locale would benefit from the increase in footfall and the high-quality amenities provided by the proposed development.
- The restoration of the unique Tipperary Pub and reuse of the rooms above for private dining/exhibition/additional bars as well as an expanded food and beverage offer at ground level would encourage a daytime and evening economy and sustain the ongoing success of this much loved tavern.
- The proposal would transform and regenerate this site along Fleet Street making it an attractive environment for wider investment.

735. Collectively these benefits are attributed **Low** weight.

736. The following **Environmental** benefits that are considered to arise:

- It would deliver student accommodation in a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy, assisting in creating sustainable patterns of transport.
- An enhanced setting of the Whitefriars Crypt will revitalise Ashentree Court and Magpie Alley delivering accessible for all, attractive and pedestrian friendly routes. The new Crypt setting would have an external presence and increased visibility including historical interpretation of the remains as well as exhibits showcasing the rich history of the Whitefriars and surrounding area, aligning with Destination City objectives
- At a local level the proposal would result in significant enhancement of the public realm at ground level, delivering enhanced permeable public space including the existing gated entrances as well as active and cultural uses which will enhance the vitality, character and distinctiveness of the site and Fleet Street, all which align with Destination City aspirations.
- The significant increase and extent of urban greening on the buildings and in the public spaces would provide a healthy, sustainable and biodiverse environment for all to access. The urban greening would

achieve a UGF score of 0.305 in line with the emerging City Plan Policy targets.

- A Wayfinding Strategy will incorporate art and creative design to make the experience of moving to and around the site and the different uses both stimulating and pleasurable for all as well as providing opportunities to connect to other cultural organisations and features based in the lanes and courtyards of Fleet Street.

737. Collectively these benefits are attributable to **Low to Moderate** weight.

738. The following **Social** benefits that are considered to arise:

- The proposals will improve this part of the city by delivering a more inviting, pleasant and easily accessible, inclusive and well-connected place for all through the improvement of several pedestrian routes and high quality public spaces.
- A range of flexible accessible cultural spaces prominently positioned at ground and lower ground floor levels, providing opportunities for a new visitor experience and learning with a focus on the story of print forming a cultural hub for schools, workers, visitors and residents which would be operated by multiple operators.
- Whitefriars Crypt will be reimagined with an expanded setting transforming the artefacts into an accessible and inclusive attraction for the first time and to include immersive and free exhibitions using modern technology to increase understanding and appeal to a broad range of visitors of all ages and levels of interest.
- The cultural proposals would attract new audiences, alongside the enhanced public realm, contributing to the transformation of Fleet Street as a distinctive and contemporary place with multiple offers for all sitting alongside the emerging Salisbury Square Development and 120 Fleet Street. The site would attract visitors, increase tourism, support and enhance the image of the area becoming a more welcoming place.
- The fit for purpose cultural spaces would provide multiple educational opportunities with creative learning programmes potentially working with existing institutions and aimed at early years, families and schools with a focus on the story of print which would be designed to align with relevant school curriculum. Sitting alongside the daytime programmes will be evening events for adults.

739. Collectively these benefits are attributable to **Low to Moderate** weight.

740. In relation to the indirect impacts on the Grade I and II* buildings, these are designated heritage assets of the highest order. When carrying out the balancing exercise, considerable importance and weight has been given to the desirability of preserving their settings and great weight given to their conservation. When considering the balancing exercise relating to the less

than substantial harm caused directly to the Grade II The Tipperary and indirectly to the Temples Conservation Area and Inner Temples Registered Historic Park and Garden great weight has been given to their conservation.

741. When carrying out the Para 208 balancing exercise in a case where there is harm to the significance of designated heritage assets, considerable importance and weight should be given to the desirability of preserving the building or its setting. In this case it is the view of officers that the collective package of the public benefits secured, and which flow from the development proposals, would outweigh the heritage harms identified to the designated heritage assets some of which are of the highest calibre, thus complying with Para 208 of the NPPF.

CIL and Planning Obligations

742. 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.
743. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
744. 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).
745. CIL contributions and City of London Planning obligations are set out below.

MCIL2

| Liability in accordance with the Mayor of London's policies | Contribution (excl. indexation) | Forwarded to the Mayor | City's charge for administration and monitoring |
|--|--|-------------------------------|--|
| MCIL2 payable | £311,700.70 | £299,232.68 | £12,468.03 |

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 | £288,756.75 | £274,318.91 | £14,437.84 |
| City Planning Obligations | | | |
| Local, Training, Skills and Job Brokerage | £115,502.70 | £114,347.67 | £1,155.03 |
| Carbon Reduction Shortfall (<i>as designed</i>) <i>Not indexed</i> | £226,290.00 | £226,290.00 | £0 |
| Section 278 (Evaluation and Design Fee) <i>Not indexed</i> | £50,000 | £50,000 | £0 |
| S106 Monitoring Charge | £5,250.00 | £0 | £5,250.00 |
| Total liability in accordance with the City of London's policies | £685,799.45 | £664,956.59 | £20,842.86 |

746. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- *Local Procurement Strategy*
- *Local Training, Skills and Job Brokerage Strategy (Demolition and Construction)*
- *Affordable Student Accommodation*
- *Student Management Plan*
- *Student Accommodation Nomination Agreement*
- *Remedial Highway Works*
- *Travel Plan*
- *Delivery and Servicing Management Plan*
- *Carbon Off-Setting Submissions*
- *Public Realm Management Plan*
- *'Be Seen' Energy Performance Monitoring*
- *Medieval Crypt, Archaeology and Heritage Implementation Strategy*
- *Cultural Space Implementation Strategy*
- *Cultural Space Management Plan*
- *Cultural Space Specification*
- *Medieval Crypt Management Plan*

- *Construction Monitoring Contribution (£30,935 for First Year and £25,760 for Subsequent Years)*
- *Highways Works and Section 278 Agreement*
- *NHS ICB Requested Contribution*

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

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

Fleet Street

- Resurfacing of the carriageway fronting the planning application site
- Reinstatement of footways as per the City of London's standard materials fronting the planning application site
- Removal and reinstatement of street furniture (if applicable)
- Reinstatement of road markings and associated traffic orders
- Reinstatement of controlled crossing and associated road markings and infrastructure

Bouverie Street

- Resurfacing of the carriageway within the frontage of the site
- Reconstruction of the footways as per the City of London's standard materials
- Removal of redundant street furniture (if applicable)
- Reinstatement of road markings and associated traffic orders
- Provision of crossover for disabled access and accommodation works
- Reinstatement of TfL cycle hire

Whitefriars Street

- Reinstatement of the footway as per City of London's standard materials
- Reconstruction of existing vehicular access to suit the new site layout

749. 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.

750. 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)

751. 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.
752. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation.
753. As discussed above, in the relevant section of the report, the applicant has submitted a Statement of Community Involvement (SCI) including a targeted programme of consultation, which sought to understand the needs of the local community. The applicant has also engaged with key stakeholders and has conducted briefings with local stakeholders. It is considered that the public consultation carried out by the applicant was inclusive and relevant in the context of the Equalities Act. The applicant has also submitted an Equalities Impact Assessment, assessing the possible effects facing the affected population and concluding as to whether these would be positive, neutral or negative.
754. Potential impacts of the proposed development on the nearby occupiers identified above have been assessed including the impacts on the uses. Officers do not consider that they would be detrimentally impacted in so far as any space becoming unusable nor would it be considered that there would be disadvantages or material impact on any persons who share a relevant protected characteristic as identified in the Equalities Act 2010
755. It is the view of officers that a decision to grant permission 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, and through the provision of an accessible parking bay within the development for future occupiers.

Human Rights Act 1998

756. 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”)).
757. 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 proportionate, in the public interest and strikes a fair balance between the interests of the owner of the site, those living nearby and the community as a whole. 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 2040.

758. 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 proportionate and strikes a fair balance between the interests of the owner of the site, those living nearby and the community as a whole.

Conclusions and Overall Planning Balance

Conclusion 24/00648/FULMAJ

759. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan (comprising the City of London Local Plan 2016 and the London Plan 2021) and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan 2040 and considering all other material considerations.
760. The scheme delivers a high-quality development for student accommodation with a new cultural space created. Whilst there would be a loss of office floorspace on the site, the City Corporation's consultant concludes that the none of the scenarios of retention of 65 Fleet Street in its existing office use, comprehensive refurbishment of this office use or redevelopment to provide new office space, are financially viable and therefore it would not be viable in the longer term for future office use. Officers consider that the proposal would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. The student accommodation and cultural spaces will contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for 7 days per week, and contribute towards meeting Local Plan housing targets. This wider range of activity would contribute towards the City Corporation's ambitions for a City of Culture and Commerce and align with the City Corporation's Destination City agenda. The loss of office accommodation is therefore considered to

be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan 2040.

761. The provision of student accommodation in a highly accessible location is supported in strategic and local planning terms. The provision of purpose-built student accommodation in this mixed-use development will not prejudice the business function of the City, will not result in an excessive concentration of student housing, is not considered to have an adverse impact on residential amenity.
762. Whilst the level of light to some of the student bedrooms falls below BRE guidance, in reviewing the amenity and breakout spaces and study areas would also have the option of various types of amenity, break out and study areas ranging from smaller quieter spaces to larger social spaces set over different levels, along with the use of the accessible roof terrace, on balance it is considered that the overall quality of the student accommodation is considered to be acceptable.
763. The purpose-built student accommodation would be considered and acceptable and would accord with London Plan Policy H15, Local Plan Policy DM21.7 and Draft City Plan Policy HS6.
764. The scheme would deliver significant cultural space in the form of a museum at ground, first and second floor comprising 1,503.65m² and provide a new home for the St Brides Foundation.
765. The architectural design of the proposals would be compatible with the existing context in terms of scale, architectural articulation and massing. The proposals are considered to result in a well layered piece of design that would improve the buildings contribution to the local townscape. The ground floors of the building would become more outward facing with new areas of active frontage, particularly on the southern elevation and within the arched passageway under the northern block. Similarly, the proposals would unlock the Whitefriars Crypt for better public viewing as well as enhancing the landscaping within the site, providing richer planting and new opportunities for siting within the courtyard which would be reopened for public access. The proposals optimise the use of land, whilst improve the buildings interface with their surroundings.
766. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises site capacity to accommodate a student accommodation development alongside ground floor retail, food & beverage and cultural uses which would contribute to the Destination City objectives and support the regeneration of Fleet Street. The proposals are considered to comply with CS10, DM10.1, DM10.2, DM10.3, DM10.4, DM10.5, DM10.6, DM10.8, CS16, DM16.2, CS19,

DM19.1 and DM19.2; emerging Local Plan policies S22, HL1, S5, RE1, RE2, S8, DE2, DE3, DE5, DE6, DE8, S10 and AT1; and London Plan (2021) policies D3, D4, D5, D8, SD4 and SD6. This is in addition to the relevant sections of the National Planning Policy Framework as well as the National Design Guide.

767. The development in pan-London and strategic views would preserve the setting of St Paul's Cathedral as the Strategically Important Landmark which go to the heart of the character and identity of the City and London. In the baseline and cumulative scenarios the proposal would slightly erode the clarity of St Bride's Church (LVMF 15B.1). As such, the development conflicts to a small degree with Local Plan Policy CS13 (1 and 2), Emerging City Plan Policy S13, London Plan Policy HC4 , GLA LVMF SPG and City of London Protected Views SPD and Westminster's Draft Metropolitan Views SPD View 42A.
768. The proposal would protect views of relevant City Landmarks and Skyline Features with the exception of some slight diminishment to St Brides Church. This would result in a degree of conflict with City Plan policy CS 13(2), draft City Plan Policy S13 and CoL Protected Views SPD
769. The direct impact of the proposals would transform the Whitefriars Crypt (II) through repair, representation. increasing opportunities for public viewing with an enhanced experience and improving access for all.
770. The direct impact of the proposals would preserve the significance of the non designated heritage assets 63 and 67 Fleet Street.
771. The direct impacts of the proposals would preserve the character and appearance of Fleet Street Conservation Area.
772. Whilst the setting and significance of identified local and more distant designated heritage assets would overwhelmingly be preserved the proposals would fail to preserve the significance/special interest or setting of the following designated heritage assets and would result in low to slight levels of less than substantial harm to: St Brides Church (I), Nos 2-6 Kings Bench Walk (I) and Nos. 3 North King's Bench Walk (II*); Inner Temple RHPG (Grade II); Temples Conservation Area, and The Tipperary (II) There would also be some conflict with Local Plan policies CS12 (1,2 and 4), DM12.1 (1), DM12.3 (2) DM12.5 (1); Emerging City Plan 2040 policies S11 (1 and 2), HE1 (1) ; London Plan Policy HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies.

773. Where the proposals have resulted in minor levels of harm to the significance of heritage assets, either directly or indirectly via setting, officers consider that this harm has been minimised and mitigated through good design, is clearly and convincingly justified, and is outweighed by the public benefits which arise from the proposal.
774. The proposals comply with policies CS12 (3 and 5), DM12.1 (2, 3 and 5) DM12.2, DM12.3 (1), DM12.4 and CS13 (3); Emerging City Plan 2040 S11 (3-5), S 13 (3), HE1 (2-9) and HE2 and with the objectives set out in Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990.
775. The proposed development is on track to achieve an “outstanding” BREEAM assessment rating. The upfront embodied carbon emissions can be reduced beyond the GLA’s Standard Benchmark. Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible, residential development. The building design responds well to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity, while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond the new Part L 2021 and London Plan requirements.
776. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel. The provision of both long stay and short stay cycle spaces would meet the requirements of the London Plan.
777. With regards Daylight, Sunlight and Overshadowing, taking into account the BRE Guidance, it is considered that the impact of the proposed development is considered to be acceptable with regards nearby dwellings, in accordance with the requirements of Local Plan policies DM10.7, DM21.3, London Plan policy D6 and Draft City Plan Policy DE8. It is also considered that the proposed development is acceptable with regards the internal daylight and sunlight levels and would provide adequate amenity to prospective students, according with London Plan policies D3, D6 and H15(A)(5), Local Plan policies DM10.7, DM15.7, DM21.3, DM21.5, and DM21.7, and draft City Plan polices DE8, DE9, and HS6.
778. There are no unacceptable adverse built development, construction or operational impacts anticipated for the proposed development and use, including cumulative impacts, and the recommendation is subject to conditions to mitigate impacts to surrounding uses, including the requirement to provide deconstruction and construction logistics plans, a scheme of protective works, a student accommodation management plan, a rooftop terrace management plan and relevant environmental health

conditions including relating to noise. Therefore, it is considered the proposed development complies with Local Plan Policies CS1, DM1.1, DM1.5, DM15.7, DM21.1, DM 21.7, and draft City Plan Policies HL3, S24, and SB1 regarding impact on amenity.

779. Therefore overall, it is considered that the proposed student accommodation use would not prejudice the primary business function of the City; would contribute to the balance and mix of uses in the immediate locality; and would not result in unacceptable adverse impacts on the amenity of neighbouring properties.
780. As set out in paragraph 205 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be).
781. In addition, other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 208 NPPF balancing exercise, and the significant weight to be placed on the need to support economic growth, also indicate that planning permission should be granted.
782. The proposals are considered to be in accordance with the development plan when taken as whole.
783. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
784. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

Conclusion on 24/00649/LBC

785. The proposals for Whitefriars crypt would not result in any changes to the structure itself, other than some minor repairs and instead involve alterations around the remains. The new enlarged space would showcase historical interpretation about the Crypt and the Whitefriars, as well as allowing for exhibitions and displays to complement the remains. The inclusion of step free access would enable the asset to be enjoyed by all. This investment made would allow for its preservation which would sustain its value longer term. Overall the proposals preserve the setting and significance of the listed building and enhance the ability to appreciate that significance; the proposals would moderately enhance the heritage experience through improved access and setting..

786. The proposals result in less than substantial harm to the Tipperary Public House (II) at the lower end of the spectrum failing to preserve the special architectural and historic interest. This harm would result from the demolition of the rear wall and windows as well as the infilling of the lightwell to the rear of the pub slightly eroding part of the historic floor plan. Otherwise the proposals would see improvements through restoration, the removal of unsympathetic partitions and other additions which have been added over time and the upper floors repurposed. Additional benefits would arise from improved circulation and enhanced accessibility with step-free access provided to each floor for the first time.
787. Overall as the proposals would fail to preserve the significance/special interest of The Tipperary (II) there would be some slight conflict with Local Plan policies CS12 (1), DM12.1 (1), DM12.3 (2); Emerging City Plan 2040 policies S11 (2), HE1 (1)); London Plan Policy HC1 (C) and the objective set out in Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies.
788. Officers consider that this minor level of harm arising to the Tipperary has been minimised and mitigated through good design, is clearly and convincingly justified, and is outweighed by the public benefits which arise from the proposal.
789. As set out in paragraph 205 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be).
790. In addition, other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 208 NPPF balancing exercise set out above in the report, and the significant weight to be placed on the need to support economic growth and social and environmental benefits indicate that listed building consent should be granted.
791. The proposals are considered to be in accordance with the development plan when taken as whole.
792. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
793. When taking all matters into consideration, subject to the recommendations of this report it is recommended that listed building consent is granted.

APPENDIX A

Background Papers

Application Documents

Design and Access Statement, prepared by BGY

Landscaping and UGF Report, prepared by BD Landscape Architects

Inclusive Access Report, prepared by David Bonnett Associates

Security Report, prepared by QCIC

Lighting Strategy, prepared by MBLD

The Tipperary Pub Management Plan, prepared by City Halo

Acoustic / Noise Report, prepared by Hilson Moran

Air Quality Assessment (including Air Quality Neutral Assessment), prepared by Hilson Moran

Preliminary Ecology Appraisal, prepared by Hilson Moran

Biodiversity Net Gain Assessment, prepared by Hilson Moran;

Overshadowing Report, prepared by GIA

Internal Daylight / Sunlight report, prepared by GIA

Solar Glare, prepared by GIA

Flood Risk Assessment, Drainage and SuDS Report, prepared by Meinhardt;

Heritage and Townscape and Visual Impact Assessment (HTVIA), prepared by The Townscape Consultancy

Office Financial Viability Assessment, prepared by Montagu Evans

Statement of Community Involvement, prepared by Concilio

Energy Assessment, prepared by Applied Energy

Ventilation/ Extraction Statement, prepared by Applied Energy

Sustainability Report, prepared by Hilson Moran

Whole Life Carbon Assessment, prepared by Hilson Moran

Circular Economy Statement, prepared by Hilson Moran

Transport Assessment, prepared by Pell Frischmann

Travel Plan, prepared by Pell Frischmann

Servicing and Delivery Plan, prepared by Pell Frischmann

Waste, Storage and Recycling Plan, prepared by Pell Frischmann

Draft Construction Logistics Plan (CLP), prepared by McAleer and Rush

Draft Construction Management Plan (CMP), prepared by McAleer and Rush
Student Needs Assessment, prepared by Cushman and Wakefield
Student Management Plan, prepared by Dominus Group
Socio-Economic Statement, prepared by Ekosogen
Health Impact Assessment, prepared by Ekosogen
Equalities Statement, prepared by Ekosoge
Fire Statement and Gateway 1 Report, prepared by Jensen Hughes
Microclimate (CFD Analysis), prepared by GIA
Cultural Placemaking Report, prepared by Alex Homfray Cultural Dimensions
VuCity Compatible Model, prepared by BGY
Archaeology Report, prepared by MOLA
Utilities Report, prepared by M&R/ Caldwell
Access Statement, prepared by David Bonnett Associates
Design Access Statement Addendum, prepared by BGY (August 2024)
Updated HTVIA, prepared by The Townscape Consultancy;
Updated Daylight and Sunlight Report, prepared by GIA dated 23.08.2024;
Planning Fire Statement Form by Jensen Hughes dated 28.08.2024;
Gateway 1 Fire Safety Form by Jensen Hughes dated 28.08.2024;
Updated Landscaping planning statement (August 2024) by BD

Consultees Responses

NATS Safeguarding - 17/07/2024
Health and Safety Executive - 30/07/2024
Environmental Resilience Officer - 01/08/2024
Historic England - 05/08/2024
Thames Water - 08/08/2024
Transport Officer - 12/08/2024
Air Quality Officer - 13/08/2024
Lead Local Flood Authority - 22/08/2024
Transport For London - 28/08/2024
City of London Police - 10/09/2024
Health and Safety Executive - 11/09/2024
Environmental Health Officer - 12/09/2024
NATS Safeguarding - 16/09/2024
Thames Water - 20/09/2024
Environmental Health Officer - 26/09/2024
Historic England - 02/10/2024
Lead Local Flood Authority - 02/10/2024

District Surveyor – 09/10/2024
The Gardens Trust – 10/10/2024
Conservation Area Advisory Committee – 14/10/2024

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 H15 Purpose-Built Student Accommodation
- 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)
- Office Use SPD (CoL, January 2015)

Relevant Draft City Plan 2040 Policies

- Policy S1 Healthy and inclusive city
- Policy HL1 Inclusive buildings and spaces
- Policy HL2 Air quality
- Policy HL3 Noise
- 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 Publicly Accessible Places
- Policy SA3 Designing in security
- Policy HS3 Residential environment
- Policy S4 Offices
- Policy OF1 Office development
- Policy OF2 Protection of Existing Office Floorspace
- Policy S5 Retail and Active Frontages
- Policy RE2 Active Frontages
- Policy S6 Culture and Visitors
- Policy CV2 Provision of Arts, Culture and Leisure Facilities

- Policy CV3 Provision of Visitor Facilities
- CV5 Evening and Night-time Economy
- Policy CV6 Public Art
- Policy S7 Infrastructure and Utilities
- Policy S8 Design
- Policy DE1 Sustainability Design
- Policy DE2 Design Quality
- Policy DE3 Public realm
- Policy DE5 Shopfronts
- Policy DE7 Daylight and sunlight
- Policy DE8 Lighting
- Policy S9 Transport and Servicing
- 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 Historic Environment
- Policy HE2 Ancient monuments and archaeology
- Policy S13 Protected Views
- Policy S14 Open spaces and green infrastructure
- Policy OS1 Protection and Provision of Open Spaces
- Policy OS2 City Urban greening
- Policy OS3 Biodiversity
- Policy OS4 Biodiversity Net Gain
- Policy OS5 Trees
- 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 S23 Smithfield and Barbican Key Area of Change
- Policy S26 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.

CS5 Meet challenges facing North of City

To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure.

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.

Policy DM 1.1 Protection of office accommodation

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

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

DM1.5 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.

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials; to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;
- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

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

- a) inclusive and safe for 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.

DM20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

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: 24/00648/FULMAJ

65 Fleet Street, London, EC4Y 8BQ

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.465m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

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

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

3. Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the

Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

4. (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 2040; 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.

5. There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective

works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and in the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

6. Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an updated detailed Circular Economy Statement, to include a site waste management plan, shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building elements. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2040; S16, CEW 1. These details are required prior to construction work commencing in order to establish the extent of recycling and minimised waste from the time that construction start.

7. Prior to the commencement of the development (excluding demolition), details of the mitigation strategy for overheating which demonstrates compliance with future weather files and adaptability for future climates. This should include detailed information on the solar shading, and other passive design measures proposed and their impact on reducing energy use and overheating prevention.

Reason: To demonstrate that the design of the development minimises energy use associated with cooling and that the building is resilient to overheating now and into the future based on predicted changes to the climate, in accordance with the following policies of the London Plan; Policy SI 4, Policy GG6,

8. 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 2040: 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.

9. Prior to the commencement of development (excluding demolition) details of the utility connection requirements of the development (or relevant part thereof) including all proposed service connections, communal entry chambers, the proposed service provider and the anticipated volume of units required for the development and a programme for the ordering and completion of service connections from the utility providers have been submitted to the local planning authority for approval in writing. No service connections shall be ordered in connection with the development unless in accordance with the final programme approved pursuant to this condition. REASON: To ensure that the utilities infrastructure arising from the development are met in accordance with policy CS2 of the Local Plan.

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

11. Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class E use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class A use takes place. REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
12. 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.
13. Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority. REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.
14. No work except demolition 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.

15. 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.

16. No development other than demolition shall begin until details of such measures as are necessary within the site to resist structural damage and to protect the approved building and the new public realm within the site, from an attack with a road vehicle or road vehicle borne explosive device, have been submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. The development shall be carried out in accordance with the approved details. REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

17. Prior to the commencement of the development (excluding demolition), a Fire Statement, in the form of an independent fire strategy produced by a third party suitably qualified assessor shall be submitted to and approved in writing by the Local Planning Authority. The statement should detail how the development proposal will function in terms of: 1. The building's construction: methods, products and materials used, including manufacturers' details; 2. The means of escape for all building users: stair cores, escape for building users who are disabled or require level access, and the associated evacuation strategy approach; 3. Features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans; 4. Access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these; 5. How provision will be made within the site to enable fire appliances to gain access to buildings; and 6. Ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures. The development shall be implemented in accordance with the approved Fire Statement and retained as such for the lifetime of the development. REASON: In order to achieve the highest standards of fire safety and ensure the safety of all building users.

18. Prior to the commencement of development (excluding demolition), a disabled access and management plan shall be submitted to the Local Planning Authority which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for the publicly accessible spaces. The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development. REASON: To ensure the hotel provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.

19. Before any construction work hereby permitted are begun, details of all proposed internal lifts shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.

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.

20. 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. Details of all external lifts including controls, maintenance strategy and signage;
- b. Details of entrance to accessible parking including siting of controlled entry system at a scale of no less than 1:20
- c. Details of all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate;
- d. Details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation, thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20;
- e. Detail of level access into the retail unit from Fleet Street;
- f. Details of student accommodation reception including details of sanitary facilities, seating and post facilities;
- g. Irrespective of the approved drawings details of step free access to the cycle stores including swept paths, end of trip facilities, cycle stand types and setting out of all accessible cycle spaces;
- h. Details of all accessible room types and locations demonstrating that the mix and quality of room types are equivalent to found elsewhere on the scheme;
- i. Details of all accessible rooms including furniture layouts at a scale no less than 1:20;
- j. Details of landscaping to all public spaces, the lower courtyard and terraces including path widths and seating and demonstrating how unwelcome touch and scent can be avoided;
- k. Details of the location of all accessible WC, ambulant WC, baby changing facilities;
- l. Details of left and right hand transfer wheelchair accessible WC and ambulant WC facilities;
- m. Details of internal amenity spaces;

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

21. Prior to the occupation of the development, an Access Management Plan 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 which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for:

1. Website information including photos and an easy read version with information on:

- a. Travel distances in metres from key step-free points of arrival including identified rest points at intervals of no more than 50m
- b. Location of dropped kerbs
- c. Sanitary facilities
- d. Facilities available on-site including dimensions and photos for (as appropriate):
 - i. accessible parking facilities
 - ii. entrances and lift access
 - iii. controlled entry points
 - iv. accessible toilets including protocol for access to Radar key if applicable
 - v. baby changing facilities
 - vi. equipment loan
 - vii. facilities for assistance animals
 - viii. assistive listening system and other assistive technology
 - ix. rest and recovery facilities/quiet room
 - x. room for reflection/prayer room
 - xi. culture space
 - xii. plant species
- 2. Inclusive Entrances Strategy
- 3. Management plan for Personal Emergency Escape Plans for building users including staff training and guidance
- 4. Booking information for visiting the crypt including arrangements for:
 - a. Alternatives to online booking
 - b. queuing eg for people who are not able to stand for periods
 - c. security
 - d. essential companions
 - e. assistance animals
 - f. places for rest and recovery
- 5. Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering.

The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.

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

22. 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.

23. 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.

24. Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems including blue roofs, rainwater pipework, rainwater harvesting systems, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 l/s, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 115m³ ; (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works. (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory. Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) A Lifetime Maintenance Plan for the SuDS system to include: - A full description of how the system would work, it's aims and objectives and the flow control arrangements; - A Maintenance Inspection Checklist/Log; Page 2 of 2 - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. REASON:

To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

25. No development shall be occupied until confirmation has been provided that either all water network upgrades required to accommodate the additional demand to serve the development have been completed or a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason: Thames Water have stated that the development may lead to no or low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.
26. Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the bedrooms does not exceed NR30 attributable to the Class F1 use of the ground floor and/or basement levels. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter. REASON: To protect the amenities of residential occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.
27. Details of the position and size of the green and brown roof(s), the type of planting and the contribution of the green and brown roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
28. Prior to the commencement of development (excluding demolition) details of the rainwater harvesting, to include the location of tanks and areas/locations of use for the collected water, shall be submitted to and approved in writing by the Local Planning Authority. REASON: To assist the environmental sustainability of the development and its resilience and adaptation to climate change in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.5.
29. Prior to implementation, details shall be submitted to and approved in writing by the local planning authority to demonstrate that opportunities have been explored to achieve a target of 0.4 urban greening factor and if not achievable provide a justification as to why a higher UGF could not be

achieved. The development shall be carried out in accordance with those approved details and a minimum urban greening factor target of 0.31 shall be maintained for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

30. 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 faces of the building, including soffits and sample panels which demonstrate the appearance and relationship of the materials with each other;
- b. Construction of a 1:1 sample material and façade panels of agreed sections of the façade;
- c. Details of the proposed new façade including typical details and samples of the fenestration, entrances, balustrading and decorative elements at a scale of no less than 1:20;
- d. Detailed drawings of a scale no less than 1:20 in plan, section and elevation of agreed typical bays;
- e. Details of the proposed roof materials, dormers and parapet walls including samples of materials and details of junctions;
- f. Details of ground floor elevations including entrances, shopfronts, artwork and historical interpretation;
- g. Full details of terraces, including all elevations, entrances, fenestration, planters, seating, lighting, soffits, drainage, and any infrastructure required;
- h. Full details of the integration of building cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
- i. Full details of access to the roof for cleaning and maintenance, including details of mansafe equipment;
- j. Details of cleaning of retained historic facades, including methodology for the protection of decorative elements;
- k. Details of all external artwork and heritage interpretation; and
- l. Details of all external materials, including samples, within the archway including flooring, windows, shopfronts, soffits, doors and lighting.

REASON: To ensure the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2; DM10.1; DM10.5; DM12.2.

31. Prior to the occupation of any part of the building all exposed flank or party walls must be faced or treated in accordance with details to be approved by the local planning authority in writing before any such works are commenced and all development pursuant to this permission shall be carried out in accordance with the approved details. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM2.1.
32. Before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
33. Before any works thereby affected are begun, details of all balustrades to external terrace areas and associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
34. Before any works thereby affected are begun, a scheme shall be submitted to an approved in writing by the Local Planning Authority which specifies the design of the roof terrace external amenity spaces and any related strategy concerning its ability to be used safely and to mitigate the risk of suicide. Such design details and strategy shall include:
- Balustrade design at all edges;
 - Affixation of furniture;
 - Treatment of the lightwell;
 - Lighting strategy;
 - Surveillance strategy and potential for CCTV; and
 - Staff training and other management procedures.
- The details approved must then be implemented and completed prior to occupation and then maintained for the lifetime of the development.
Reason: In order to ensure that the external amenity spaces are appropriately designed to mitigate the risk of suicide so far as possible, in line with Local Plan Policy CS3, draft City Plan Policy DE5 and the recommendations of the Planning Advice Note.
35. Prior to the commencement of the relevant works, a detailed room layout shall be provided to the Local Planning Authority to demonstrate that student bedrooms have been laid out and designed to maximise daylight to desks/study areas and position these within the brightest parts of each room. Reason: To maximise daylight and sunlight to areas used for more

light sensitive activities in accordance with the requirements of Local Plan Policies DM10.7, DM21.3 and DM21.5, London Plan Policies D3, D6 and H15(A)(5) and Draft City Plan Policy DE8.

36. Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- a) Details of all soft landscaping, including the position, size and types of all planting and details of their respective planting beds;
 - b) Details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights; and details of tree pits/trenches and growing medium;
 - c) Details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement irrigation;
 - d) Details of the method of irrigation and nutrient delivery systems;
 - e) Details of all urban furniture, including planters; seating; refuse bins; biodiversity habitat structures;
 - f) Details of all hard landscaping materials, including paving and tactile paving details (including contrast where appropriate) and samples, in accordance with the City Public Realm Technical Manual;
 - g) Details of landscape lighting;
 - h) A management and maintenance Plan (including ecological management) for all proposed landscaping; and
 - i) Details of permanent wayfinding features and other installations.
 - k) Details of external terraces to show inclusive access routes, planters, planting and furniture.

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: 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 and emerging policies DE2, DE6 and HE1 of the Draft City Plan 2040.

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

lighting layout/s; - details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure); - a lighting control methodology; - proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies; - all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; - details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 , CS15 and emerging policies DE1, DE2 and HL3 of the Draft City Plan 2040.

38. 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.
39. Prior to the installation of any generator a report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time. Reason In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.
40. A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating) shall be submitted as soon as practicable after practical completion. REASON: To

demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

41. No later than 3 months after completion of the building and prior to the development being occupied, a post-completion Circular Economy Statement shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development. REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.
42. Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority . The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed. Reason: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.
43. 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.

44. No servicing of the approved development by motorised vehicles shall occur during the hours of 0700 - 1000, 1200 - 1400 and 1600 - 1900 on any day
REASON: To ensure that the development does not have an adverse impact on the free flow of traffic or highway safety in the surrounding streets in accordance with the following policy of the Local Plan: DM16.1.

45. No doors, gates or windows at ground floor level shall open over the public highway. REASON: In the interests of public safety and to comply with section 153 of the Highways Act 1980.
46. Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 659 no. long stay pedal cycles and 74 no. short stay pedal cycles. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking. A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people. REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
47. If within a period of five years from the date of the planting of any tree, that tree or any tree planted in replacement for it, is removed, uprooted, destroyed, dies or becomes, in the opinion of the Local Planning Authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation. REASON: In order to ensure the continued presence of trees on the site in the interest of visual amenity in accordance with the following policies of the Local Plan: DM10.4, DM19.2.
48. No flues, ductwork, soil stacks, soil vent pipes or any other pipe-work other than rainwater pipes shall be fixed to the elevations of the building unless shown on the drawings hereby approved. REASON: To ensure that the external appearance of the building is satisfactory in accordance with the following policy of the Local Plan: DM10.1.
49. No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM21.3.
50. A minimum of 10% of the student accommodation rooms within the development shall be wheelchair accessible as set out in the approved details and retain thereafter for the lifetime of the development. REASON: To ensure the development provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and London Plan Policy D5.
51. The car parking space suitable for use by disabled people shall be provided on the premises in accordance with the drawings hereby approved and shall

be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors. REASON: To ensure provision of suitable parking for disabled people in accordance with the following policies of the Local Plan: DM16.5, draft Local Plan 2040: 6.13D and 6A.2 and London Plan: T6.5.

52. The provision of a Changing Places facility shall be provided, within the development, in line with British Standard BS 8300-2. The changing places toilet shall only be used by/for those with a need for specialist assisted toilet and changing facility. REASON: To ensure that sufficient accessible sanitary facilities are provided, and that the museum provides a fully accessible and inclusive facility in accordance with London Plan Policy S6 and Local Plan Policy 10.8 and London Plan Policy D5.
53. One electric charging point must be provided within the delivery and servicing area for the use of delivery and servicing vehicles and retained for the life of the development. REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16 and draft Local Plan 2040 Policy VT2.
54. Pre-booked goods delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the loading bay of the building. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.
55. The refuse collection and storage facilities 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.
56. 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.
57. All residential premises in the development shall be designed and constructed to attain the following internal noise levels: Bedrooms- 30dB LAeq,T* and 45dB LAmix Living rooms- 30dB LAeq, T* *T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00- 23:00. A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any part of the building. REASON: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of

excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3 and D21.5.

58. (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority. REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

59. The roof terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day other than in 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.

60. No amplified or other music shall be played on the roof terraces.

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

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

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

62. There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3 64

63. No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
64. All ecological data gathered to support this application and gathered as part of ongoing monitoring to inform management, shall be submitted to the relevant Local Environmental Records Centre (LERC) currently Greenspace Information for Greater London (www.gigl.org.uk). REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
65. The maximum height of the building shall comply with the approved drawings and shall not exceed 55.465AOD including, plant, flues, lift over run, and other excrescences at roof level including within the plant room located at level 10. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
66. 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.
67. At all times when not being used for cleaning or maintenance the window cleaning Davit Arm, associated building maintenance and cleaning equipment, and other similar equipment shall be stored internally of the building envelope and shall at no time be stored on the roof of the building. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1
68. All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance. REASON: Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.
69. The floorspace within the development marked as Learning and Non-residential institutions – Use Class F1 (including Crypt) on the floor plans at

ground floor and lower ground floor (1,503.68sqm) hereby approved, shall be used for such uses (Class F1(c)) and for no other purpose (including any other purpose within Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure that active public uses are retained to ground floor.

70. Prior to occupation, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, the cultural uses, cycle parking and any other relevant uses shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.

71. The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design and, prior to the commencement of the relevant works, these measures shall be submitted to and approved in writing by the Local Planning Authority. These design measures should refer to the SBD Homes Guide (2023) and the SBD Commercial Guide (2023).

REASON: To ensure that safety and security are appropriately considered during the later design stages of the proposed development, and in accordance with Local Plan Policy CS3 and DM 3.2, and London Plan Policy D11.

72. Prior to the occupation of the building details of a public art strategy and the proposals for within the public realm or on buildings to include, but not exclusively limited too, and unless otherwise agreed, the eastern wall to the pedestrian route under 65 Fleet Street, demonstrating: commissioning process; artistic merit; appropriateness to siting; deliverability; maintenance; management and engagement with Fleet Street BID and City Arts Initiative and wider community; shall be submitted to and approved in writing by the Local Planning Authority. The public art strategy shall be carried out as approved and so maintained.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: CS12 and DM 11.2. This is required to be prior to commencement in order to ensure that the memorials are safely removed and retained.

73. All Parish Markers and commemorative plaques on the existing buildings shall be carefully protected or removed prior to demolition commencing. If removed these shall be stored for the duration of building works, reinstated and retained for the life of the building on the new building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.

74. Notwithstanding the approved drawings, the existing gates to the central courtyard, including within the archway, are to be removed and will not be reinstated.

REASON: To enhance pedestrian permeability regardless of time of day in accordance with the following policies of the Local Plan: CS10, DM10.4, DM16.2.

75. 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:

- 1289-GE-01 Rev 02
- 1289-GE-02 Rev 02
- 1289-GE-03 Rev 02
- 1289-GE-04 Rev 02
- 1289-GE-05 Rev 02
- 1289-GE-06 Rev 02

- 1289-BS-17
- 1289-BS-16
- 1289-BS-15
- 1289-BS-14
- 1289-BS-13
- 1289-BS-12
- 1289-BS-11
- 1289-BS-10

1289-BS-09
1289-BS-08
1289-BS-07
1289-BS-06
1289-BS-05
1289-BS-04
1289-BS-03
1289-BS-02
1289-BS-01

W0863-WW-ZZ-LG-DR-A-0201-Level LG Planning Plan -S2-P15
W0863-WW-ZZ-B1-DR-A-0200-Level B1 Planning Plan-S2-P14
W0863-WW-ZZ-10-DR-A-0212-Level 10 Planning Plan-S2-P10
W0863-WW-ZZ-09-DR-A-0211-Level 09 Planning Plan-S2-P09
W0863-WW-ZZ-08-DR-A-0210-Level 08 Planning Plan-S2-P09
W0863-WW-ZZ-07-DR-A-0209-Level 07 Planning Plan -S2-P10
W0863-WW-ZZ-06-DR-A-0208-Level 06 Planning Plan -S2-P10
W0863-WW-ZZ-05-DR-A-0207- Level 05 Planning Plan -S2-P10
W0863-WW-ZZ-04-DR-A-0206- Level 04 Planning Plan -S2-P09
W0863-WW-ZZ-03-DR-A-0205- Level 03 Planning Plan -S2-P10
W0863-WW-ZZ-02-DR-A-0204- Level 02 Planning Plan -S2-P10
W0863-WW-ZZ-01-DR-A-0203- Level 01 Planning Plan -S2-P09
W0863-WW-ZZ-00-DR-A-0202- Level 00 Planning Plan -S2-P13

W0863-WW-ZZ-ZZ-DR-A-0432-Tipperary Demolition Section 03-S2-P02

W0863-WW-ZZ-ZZ-DR-A-0422-Tipperary Proposed Section 03 -S2-P02

W0863-WW-ZZ-ZZ-DR-A-0421-Tipperary Proposed Section 02 -S2-P03

W0863-WW-ZZ-00-DR-A-0226- Tipperary Level 00 Composite
Demolition Planning Plan -PL-P03

W0863-WW-ZZ-00-DR-A-0222-Tipperary Level 00 Planning Plans -S2-
P05

W0863-WW-ZZ-B1-DR-A-1220- Tipperary Level B1 Demolition Plans -
S2-P04

S2- W0863-WW-ZZ-B1-DR-A-0221- Tipperary Level B1 Planning Plans-
P04

W0863-WW-ZZ-00-DR-A-0431- Tipperary Demolition Section 02 -PL-
P02

W0863-WW-ZZ-ZZ-DR-A-1224- Tipperary Level 0405 Demolition Plans
-S2-P04

W0863-WW-ZZ-ZZ-DR-A-1223- Tipperary Level 0203 Demolition Plans
-S2-P04

W0863-WW-ZZ-ZZ-DR-A-0225- Tipperary Level 0405 Planning Plans -
S2-P04

W0863-WW-ZZ-ZZ-DR-A-0224-Tipperary Level 0203 Planning Plans -
S2-P04

W0863-WW-ZZ-ZZ-DR-A-0430- Tipperary Demolition Section 01-PL-
P02

W0863-WW-ZZ-ZZ-DR-A-0420- Tipperary Proposed Section 01-PL-
P03

1289-DE-01 Rev 00

1289-DE-02 Rev 00

1289-DE-03 Rev 00

1289-DE-04 Rev 00

1289-DE-05 Rev 00

1289-DE-06 Rev 00

DS-01 Rev 00

DS-02 Rev 00

W0863-WW-ZZ-01-GA-A-1203-Level 01 Demolition Plan -S2-P04

W0863-WW-ZZ-00-GA-A-1202- Level 00 Demolition Plan -S2-P04

W0863-WW-ZZ-06-GA-A-1208- Level 06 Demolition Plan -S2-P04
W0863-WW-ZZ-05-GA-A-1207- Level 05 Demolition Plan -S2-P04
W0863-WW-ZZ-04-GA-A-1206- Level 04 Demolition Plan -S2-P04
W0863-WW-ZZ-03-GA-A-1205- Level 03 Demolition Plan -S2-P04
W0863-WW-ZZ-02-GA-A-1204- Level 02 Demolition Plan -S2-P04
W0863-WW-ZZ-B1-GA-A-1200- Level B1 Demolition Plan -S2-P04
W0863-WW-ZZ-11-DR-A-0213- Level RF Planning Plan -S2-P06
W0863-WW-ZZ-08-GA-A-1210- Level 08 Roof Demolition Plan-S2- P
04
W0863-WW-ZZ-07-GA-A-1209- Level 07 Demolition Plan-S2-P04
W0863-WW-ZZ-LG-GA-A-1201- Level LG Demolition Plan -S2-P04

W0863-WW-XX-XX-GA-A-0102- Site Plan - PL-P02

W0863-WW-XX-XX-GA-A-0100- Site Location Plan -S2-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. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed online via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C79bb749481fb4aebb01c08dc265fae0d%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638427439639442980%7CUnknown%7CTWFpbGZsb3d8eyJWljoijMC4wLjAwMDA6MzU1LCJBTiI6IjEhYWwiLCJXVCi6Mn0%3D%7C0%7>

C%7C%7C&sdata=rGcgQXRzTRNW

RQBpRG%2Bpqnld0yLT1E01iZQ1YDGWcxo%3D&reserved=0.

Please refer to the Wholesale; Business customers; Groundwater discharges section.

2. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
3. The applicant is advised to contact TfL Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant: scaffolding: security; boundary treatment; safety barriers; landscaping and lighting. A Party Wall notice will be required to be served to Transport for London Infrastructure Protection in advance of carrying out any works near or on a party wall.
4. A Party Wall notice will be required to be served to Transport for London Infrastructure Protection in advance of carrying out any works near or on a party wall.
5. Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
6. Small refuse vehicle is expectable on this proposal but architects are reminded to work with standard RVC dimensions.
7. Waste store to be built to BS5906 specifications.
8. Waste bins cannot be left on the highway for collection.
9. 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.
10. 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.

11. 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)

12. HSE – CFD Modelling

As highlighted in the advice of the Health and Safety Executive in their Gateway One response, CFD modelling is required to demonstrate that the arrangement of stairways and their access to basement is sufficient for fire safety purposes. Should CFD modelling demonstrate that this is not the case, this planning approval would need to be amended to reflect a regulation compliant design.

13. HSE – Operational Hydrant

As highlighted in the advice of the Health and Safety Executive in their Gateway One response, should an operational hydrant not be present at a suitable location to serve the site then an application would need to be made to install an operational hydrant.

14.

SCHEDULE

APPLICATION: 24/00649/LBC

65 Fleet Street, London, EC4Y 8BQ

External and Internal alterations to The Tipperary Pub including part demolition of the rear of the pub; erection of 1 storey roof extension containing student accommodation with associated expansion into northern block of 65 Fleet Street at fifth floor level. Works to improve access to Whitefriars Crypt with changes to the surrounding structure of the Crypt to allow for presentation and interpretation of the asset.

1. The works hereby permitted must be begun before the expiration of three years from the date of this consent.

REASON: To ensure compliance with the terms of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2. Before any works hereby consented are begun, a full survey including photographic record of the exterior and interior of the Tipperary Pub shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure suitable record is kept of this version of the building in accordance with the following policy of the Local Plan:DM12.3.

3. Before any works hereby consented are begun, a full survey including photographic record of the exterior and interior of the Remains of the Former Whitefriars Convent shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure suitable record is kept of this version of the building in accordance with the following policy of the Local Plan:DM12.3.

4. Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect original external and internal features of the Tipperary Pub during the building work. These shall remain in place for the duration of the construction/ alteration work hereby permitted.

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: DM12.3

5. Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect original external and internal features of the Remains of the Fromer Whitefriars Convent during the building work. These shall remain

in place for the duration of the construction/ alteration work hereby permitted.

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: DM12.3

6. Before any works hereby consented are begun in relation to the Tipperary Pub details of the following shall be prepared by a suitably qualified professional and submitted to and approved in writing by the Local Planning Authority. All works pursuant to this consent must be carried out in accordance with the approved details.
 - (a) a full methodology for the proposed works, including a heritage method statement and a schedule of all proposed works;
 - (b) detailed condition survey of the buildings;
 - (c) Details, including method statement for works to unveil the potential survival of original or historic features, underneath existing modern fabric;
 - (d) Details, including a heritage method statement and samples of materials, of repair works (including both internal and external cleaning).

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: DM12.3.

7. Before any works hereby consented are begun in relation to the Remains of the Former Whitefriars Convent details of the following shall be prepared by a suitably qualified professional and submitted to and approved in writing by the Local Planning Authority. All works pursuant to this consent must be carried out in accordance with the approved details.
 - (a) a full methodology for the proposed works, including a heritage method statement and a schedule of all proposed works;
 - (b) detailed condition survey of the buildings;
 - (c) Details, including method statement for works to unveil the potential survival of original or historic features, underneath existing modern fabric;
 - (d) Details, including a heritage method statement and samples of materials, of repair works (including both internal and external cleaning).

REASON: To ensure the preservation of historic building features and fabric in accordance with the following policy of the Local Plan: DM12.3

8. During the works, if hidden historic features are revealed they should be retained in-situ. Works shall be halted in the relevant area of the building and the Local Planning Authority should be notified immediately. Failure to do so may result in unauthorised works being carried out and an offence being committed.

REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

9. Prior to the commencement of relevant works, a method statement shall be submitted to and approved by the local planning authority setting out the methodology for the safe removal, storage and reinstatement of the wooden panelling located on the rear wall of the ground floor bar of The Tipperary. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM12.1, DM12.3.

10. 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) repairs to the mosaic at the entrance threshold ground floor
- (b) comprehensive schedule and specification of internal and external repairs
- (c) details of removal and replacement of existing timber lintels
- (d) details of any fire upgrading required to existing historic fabric
- (e) details of new internal doors, skirtings and architraves and other joinery where relevant
- (f) details of new door to the covered pedestrian route ground floor west elevation

REASON: To ensure 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: CS12, DM12.1, DM12.3.

11. Prior to the commencement of the relevant works, full details of the restoration and incorporation of building services into the retained historic cellular spaces of The Tipperary Pub shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the Local Planning Authority may be satisfied that the special architectural and historic interest of the listed building is conserved and enhanced in accordance with the following policies of the Local Plan: CS 12, DM 12.1, DM 12.3.

12. Before any works thereby affected are begun a Fire Strategy for The Tipperary Pub shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details.

REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

13. Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect the windows during the building work, particularly the historic window glass. The agreed measures shall be carried out in full. No such features shall be disturbed or damaged or removed temporarily or permanently to facilitate protection except as indicated on the approved drawings or with prior approval in writing. Any intact historic window glass damaged during the building work shall be reported to the Local Planning Authority and shall be replaced like-for-like from a suitable approved source.

REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

14. Prior to the commencement of the relevant works, full details of the new link between The Tipperary Pub and No.67 Fleet Street shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the Local Planning Authority may be satisfied that the special architectural and historic interest of the listed building is conserved and enhanced in accordance with the following policies of the Local Plan: CS 12, DM 12.1, DM 12.3.

15. 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 faces of the extension around the Remains;

- (b) Details of the proposed new façade including typical details and samples of the fenestration and entrances at a scale of no less than 1:20;
- (c) Details of external artwork and historical interpretation; and
- (d) Details of signage and wayfinding for the Remains.

REASON: To ensure 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: CS12, DM12.1, DM12.3.

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

- (a) details of any proposals arising from any condition and structural surveys of the Remains of the Fromer Whitefriars Convent;
- (b) details of protection measures to the Remains of the Fromer Whitefriars Convent following completion of the development;
- (c) details of basement level, ground level and all finishes in the area of the display space of the Remains of the Fromer Whitefriars Convent;
- (d) details of the directional information and interpretative material internally and on external elevations, including the new external wayfinding; and
- (e) details of the display wall and cases within the proposed basement display and ground floors, to a scale of not less than 1:5, including materials of the display walls, cases, objects, wording and methods of illumination.

REASON: To ensure the protection of the significance and setting of the listed building and that the Local Planning Authority may be satisfied with the detail of the proposed works and to ensure a satisfactory appearance in accordance with the following policies of the Core Strategy CS12.

17. All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent.

REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

Name: Ardit

- Surname: Gjoka

- Address: Goodman Style, Ludgate Circus

- Postcode: Ec4m 7lf

- Email:

- Phone number (optional):

- Message (optional):

- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:

- I consent for this letter of support to be published on City of London Corporation planning portal.

Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellants in the event of an appeal, including an enforcement appeal:

Adjei, William

Subject: FW: Letter of support for 65 Fleet Street London EC4Y 8BQ

- Name: Ashley

- Surname: Grant

- Address: Indochine, 62 Fleet Street
- Postcode: Ec4y 1ju

- Email:

- Phone number (optional):
- Message (optional):

- I support this application because:

- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation: on

- I consent for this letter of support to be published on City of London Corporation planning portal. Your address will be published on City of London Corporation planning portal but your personal details, i.e. email address and telephone number, will not appear. Your name and address may be given to the Planning Inspectorate and the appellants in the event of an appeal, including an enforcement appeal: on

- I support the proposal to retrofit and rejuvenate a derelict building, that will improve Fleet Street and the local area: on

- I support the sustainable design approach to retain and upgrade the existing building, which makes it more environmentally friendly:

- I support the refurbishment of the listed Tipperary Public House to return a much loved high-street amenity to the Fleet Street local and business community: on

- I support the provision of high quality and professionally managed purpose-built student accommodation that will benefit students, local universities and the local area: on
- I support the delivery of new public/ cultural uses, which aim to deliver a print related visitor experience and learning centre, in partnership with St Bride Foundation: on

- I support the proposal in that it will generate social and economic benefits for the local community: on

Letter of support for Application (24/00648/FULMAJ) for 65 Fleet Street, London -

<https://conciliocomms.com/conciliosupports-65-fleet-street/>

- Name: Andy
- Surname: Conway
- Address: Bowing, 58 Fleet Street
- Postcode: EC4Y 1JU
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
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- I support the proposal in that it will generate social and economic benefits for the local community:

- Name: Teodora
- Surname: Bakardzhieva
- Address:
- Postcode: Ec4y1bn
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
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- I support the delivery of new public/ cultural uses, which aim to deliver a print related visitor experience and learning centre, in partnership with St Bride Foundation:

- Name: Gillian
- Surname: Jupp
- Address: Jupp, 30 Fleet Street
- Postcode: EC4Y 1aa
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
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- Name: Celal
 - Surname: Kanidagli
 - Address: 24 Tudor Street
 - Postcode: EC4Y 0AY
 - Email:
 - Phone number (optional):
 - Message (optional):
 - I support this application because:
 - I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation: on
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- Name: James
- Surname: Li
- Address: Chi Noodle & Wine Bar, 5 new bridge street
- Postcode: EC4V 6AB
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
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- I support the proposal in that it will generate social and economic benefits for the local community:

- Name: Artur
- Surname: Mihalcean
- Address: Humble Grape, 1st brides passage
- Postcode: EC4Y 8 EJ
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
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- I support the proposal in that it will generate social and economic benefits for the local community:

- Name: Matt
- Surname: Ryan
- Address: The Albion, 2-3 new bridge street
- Postcode: EC4V 6AA
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
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- I support the proposal in that it will generate social and economic benefits for the local community:

-
- Name: Najib
 - Surname: Haqqi
 - Address: 3 new street square
 - Postcode: Ec4a 3bh
 - Email:
 - Phone number (optional):
 - Message (optional):
 - I support this application because:
 - I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation: on
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-Name: Kendal

-Surname: Atherton

-Address: Java Java, 160 fleet street

-Postcode: EC4A2DQ

-Email:

- Phone number (optional):

- Message (optional):

-I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:

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- I support this application because:

- I support the proposal in that it will generate social and economic benefits for the local community

- Name: Kishan
- Surname: Thawrani
- Address: Ryman Stationery 149 Fleet Street
- Postcode: Ec4A 2BU
- Email:
- Phone number (optional):
- Message (optional): To help drive footfall

- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:

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- I support this application because:
 - Please see message above

- Name: Charlie
- Surname: O'donnell
- Address: Scotts, 65 Ludgate Hill
- Postcode: EC4M7JH
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
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- Name: Martin
- Surname: Barnett
- Address: Paternoster chophouse
- Postcode: Ec4m 7au
- Email:
- Phone number (optional):
- Message (optional):
- I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation:
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From: PLN - Comments
To:
Subject: Letter of support for Application 65 Fleet Street London EC4Y 8BQ
Date: 21 August 2024 13:03:14

THIS IS AN EXTERNAL EMAIL

- Name: Ruby
 - Surname: Kaur
 - Address: 93 Fleet Street
 - Postcode: EC4Y 1DH
 - Email:
 - Phone number (optional):
 - Message (optional):
 - I support this application because:
 - I express my support for this application (Application Number: 24/00648/FULMAJ) and I consent for my comment of support to be shared with City of London Corporation: on
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9 September 2024

FAO: Emma Barral, City of London

**Development of 65 Fleet Street, London EC4Y 8BQ
(Planning application ref. 24/00648/FULMAJ)**

Dear Emma,

I write to set out the Guildhall School of Music & Drama's support for Dominus's planning application at 65 Fleet Street.

As you will be aware, the Guildhall school is located in the City of London. We currently educate around 1,100 students and manage one student accommodation building at Sundial Court, Chiswell Street, just outside the City's boundaries. Sundial Court can accommodate around 170 of our students.

Pending securing appropriate internal City of London approvals, we intend to engage with Dominus to explore the potential for a nominations agreement that will provide the School with access to a proportion of the proposed development's affordable rooms.

These affordable rooms are provided at levels capped by the Mayor of London. They are currently capped at no more than £193 per week, across a 38-week academic year. These levels are beneficial for our students, being significantly lower than the £231 per week that we must currently charge our students at Sundial Court.

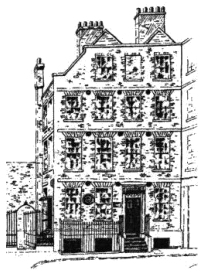
We believe our students will significantly benefit from living in such high-quality accommodation and the opportunity to mix with students studying at other Central London universities. 65 Fleet Street is also well connected overall, and a short cycle or bus journey from our campus and a comfortable walk.

We are pleased to set out our support for this planning application and look forward to the building opening, so that our students can start to enjoy living in such high-quality accommodation that is located within walking distance of our campus.

Yours sincerely,



Prof. Jonathan Vaughan
Principal



DR. JOHNSON'S HOUSE

17 Gough Square
London EC4A 3DE
Tel: [REDACTED]

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

Planning application ref. 24/00648/FULMAJ (and associated listed building consent application ref. 24/00649/LBC)

65 Fleet Street

To whom it may concern,

I write on behalf of Dr Johnson's House to support of Dominus' proposal to redevelop 65 Fleet Street. My reasons for supporting the application are:

1. I believe this development will provide economic and social benefits to Dr Johnson's House and the surrounding area, and to the City more broadly. This development contributes to existing plans for the City and specifically the Fleet Street Quarter area by increasing the number of residents and – importantly - diversifying the demographic. This will have the potential to impact Dr Johnson's House directly by bringing potential new audiences to our doorstep, and by developing a community we are keen to serve – our charitable aims focus on education and promoting literacy and language skills and we can develop programmes to serve this new local community.
2. I believe it will add to the vibrancy of the area and increase dwell time in the City of London, thus increasing expenditure, not least with visiting family and friends. I think this will contribute to Dr Johnson's House's aims and the City Destination themes well.
3. I am pleased to see a derelict building being rejuvenated, as too many sites along Fleet Street have been empty for too long. The plans for 65 Fleet Street complement the wider development of Fleet Street and the plans for 120 Fleet Street and the new Justice Quarter currently under construction.
4. I am especially excited by the careful consideration and vision going into the cultural offering this development will deliver: from bringing the medieval crypt into public view for the first time, to providing suitable space for the general public to explore and learn about the historic significance of Fleet Street with regard to print media and the written word, to the re-opening of the historic Irish Pub, the Tipperary. Again, I can see the benefits to the existing local community, residential and business, and to the incoming residents (students within the building) and to surrounding businesses, driven by the increased footfall to the area such attractions would bring. The potential to collaborate of programming is well-received also.

I hope that you will take these comments into account in determination of the applications for planning permission and listed building consent at 65 Fleet Street.

Celine Lupp McDaid MA (Oxon) MA FRSA
The Hyde Director

Dr Johnson's House
17 Gough Square
London, EC4A 3DE

[REDACTED] / www.drjohnsonshouse.org

Comments for Planning Application 24/00648/FULMAJ

Application Summary

Application Number: 24/00648/FULMAJ

Address: 65 Fleet Street London EC4Y 1HT

Proposal: Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Case Officer: Emma Barral

Customer Details

Name: Mr Tim Cutter

Address: Avison Young 65 Gresham Street London

Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: Construction Logistics Plan - comments

Pg 5 - "The demolition and construction works at 65 Fleet St will generate a considerable amount of construction traffic" - Has the contractor issued a vehicle movement profile that takes due consideration of all other traffic movements in the immediate locale (not least construction traffic for the Salisbury Square Development)?

Pg 7 - Site Layout - Strip Out & Demolition - a detailed programme needs to be developed to ensure safe and efficient works delivered in a way so as to not fetter progress of the Salisbury Square Development.

This programme should indicate the dates of any pit lanes and tower crane mobilisation, erection and demobilisation.

Any scaffolding along the Whitefriars St elevation will need to coordinate and be accepted by the Salisbury Square Development main works contractor (Mace).

"Site traffic will be coordinated to avoid peak traffic hours". These times are not specified - page 15 indicates no deliveries between 08:00 - 09:00 & 17.00 - 18.00. This would need coordination and the acceptance of the Salisbury Square Development main works contractor (Mace).

Pg 8 - Figure 3 - Initial Site Layout. When will this be formed, particularly the pit lane on Fleet Street? This needs to be co-ordinated with and be accepted by the Salisbury Square Development

main works contractor (Mace).

A demonstration of how the temporary logistics space will work with the planned quantity of vehicle movements for the delivery of the Works.

For safety of pedestrians and "pedestrian comfort", a demonstration that vehicles do not impede the pavement should be provided. The actual size of proposed vehicles (i.e. rigid truck?) should be included in this demonstration.

There is no clear indication that vehicles movements include reversing up Whitefriars Street and how traffic and pedestrian movements will be managed to remove all safety risks.

Comments for Planning Application 24/00648/FULMAJ

Application Summary

Application Number: 24/00648/FULMAJ

Address: 65 Fleet Street London EC4Y 1HT

Proposal: Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Case Officer: Emma Barral

Customer Details

Name: Mr tim cutter

Address: Avison Young 65 Gresham Street London

Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: Construction Logistics Plan - comments

pag9 - Will a new, temporary road crossing be provided? Currently there is no safe crossing for pedestrians from Ludgate circus. Co-ordination and swept path analysis should demonstrate how site traffic movements will be coordinated with the adjacent pit lanes operated by the Salisbury Square Development main works contractor (Mace).

The removal of the traffic lights will naturally require approval by TfL.

NOTE - It is understood that any proposal to re-locate a pedestrian crossing will require a design from the applicant to satisfy a City Road Safety audit and TfL traffic impact assessment.

Pg 12 Pedestrian Management plans must co-ordinate with the approved CLP of the Salisbury Square Development main works contractor (Mace).

Pg 14 - If the contractor intends to utilise Datascope access control system, this should co-ordinate with, and be informed by recorded traffic movements for Whitefriars Street.

Pg 18 - Figure 9 - Delivery Routes. Route 4 "unimpeded access". All access routes need to be co-ordinated with and be accepted by the Salisbury Square Development main works contractor (Mace). The agreed SSD construction programme requires unfettered access from January 2025

for steelwork installation and access to the basement levels of commercial building, 1 Salisbury Square.

Pg 20 - Table 2. A demonstration of how these predicted vehicle movements aligns with the construction programme. The total number of movements should be split between the four routes in Figure 9.

Pg 24 - Figure 10 would indicate that access is required from Mace's temporary logistics area. All details including any reconfiguration of vehicle barriers etc and timing (i.e. during out of normal hours) must co-ordinate with and be accepted by the Salisbury Square Development main works contractor (Mace). All associated costs borne by Mace must be reimbursed by the developer for 65 Fleet Street.

Comments for Planning Application 24/00648/FULMAJ

Application Summary

Application Number: 24/00648/FULMAJ

Address: 65 Fleet Street London EC4Y 1HT

Proposal: Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Case Officer: Emma Barral

Customer Details

Name: Mr Tim Cutter

Address: Avison Young 65 Gresham Street London

Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: Construction Logistics Plan - comments

Pg 25 - Point 15. Wheel washing facilities need to be provided for any vehicles accessing Whitefriars Street.

Pg 28 - Early engagement with key stakeholders. This must include The Harrow pub, St Brides Church, 8 Salisbury Square etc. It is not apparent that this has been carried out at the time of the submission of the planning application.

Pg 30 6.8 Temporary Services. It should not be assumed that the (network) substations nearest to the site have capacity to serve the site. The use of local sub-stations cannot be allowed to impact the delivery of the Salisbury Square Development. Appendix A - Site entrance - this should be set in-bound from Whitefriars Street pavement to provide safe and unimpeded access for pedestrians. Appendix C - Oversailing agreements are not in place with the developer of Salisbury Square Development. It would appear that an anti-collision system designed, implemented and funded by the developer of 65 Fleet Street is required to remove the risk of collision with existing cranes operating on the Salisbury Square Development. Appendix D - Swept Path Analysis. This must be co-ordinated with and be accepted by the Salisbury Square Development main works contractor (Mace). It is not clear what impact results from abnormal loads. Temporary road markings will be required to be amended to suit new routing plan. CoL Highways should be consulted not lease to

agree safe vehicle movement from Fleet St to Bouverie Street. Vehicle access adjacent to Ashentree Court do not appear to work.

Comments for Planning Application 24/00648/FULMAJ

Application Summary

Application Number: 24/00648/FULMAJ

Address: 65 Fleet Street London EC4Y 1HT

Proposal: Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Case Officer: Emma Barral

Customer Details

Name: Mr Tim Cutter

Address: Avison Young 65 Gresham Street London

Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: Construction Management Plan.

A detailed, logic linked programme is required. This must be co-ordinated with and be accepted by the Salisbury Square Development main works contractor (Mace). Co-ordination and agreement of City of London Highways is required to align with the phasing Section 278 works. The removal of two temporary electrical substations adjacent to The Harrow pub needs to be identified. Pg 27 - Assembly Point needs co-ordination with Mace and all neighbouring occupiers of commercial and residential premises. Pg 57 - Detailed Logistics and Delivery Programme - Tower Crane erection and dismantling dates and all interfaces with Whitefriars Street.



Workspace
160 Fleet Street
London
EC4A 2DQ

17 September 2024

Mr. Shravan Joshi MBE
Chairman Planning and Transportation Committee
City of London
PO Box 270
Guildhall
London
EC2P 2EJ.

Dear Sir

65 Fleet Street London EC4Y 8BQ: 24/00648/FULMAJ

I am writing on behalf of Fleet Street Quarter BID. We were formally established on 1 April 2022 and represent over 350 businesses located in and around Fleet Street. We are working with our partners to create a world class destination here in Fleet Street, making it a dynamic leading business quarter with high quality public spaces.

I am writing to support the above application as it aligns closely with our priorities for the area as set out in our BID Proposal on which we were elected as follows:

1. Strategic Theme 1: Putting Fleet Street Back on the Map

This theme is about creating the FSQ as a vibrant and dynamic location that will reposition it as a place to work, visit, live and invest in. The Proposals contribute to this theme in the following ways:

The Tipperary Pub is one of London's iconic pubs with much history. The re-opening of part of the pub as an independent pub, serving Guinness and other Irish beers has proved very successful. The pub is very well used and clearly attracts people from wide area. The proposals seek to build on this success by expanding the pub and animating the street.

The partnership with St Bride Foundation will provide a new cultural space, including a free visitor experience about Fleet Street and the story of print and education space for St Bride Foundation's school programmes. It will bring the Foundation onto Fleet Street, giving it exposure to a much wider audience and will contribute to the Principle Retail Shopping Centre designation.

Whitefriars Crypt will be made significantly more visible and accessible - it will be put on the map as a unique and historic place to visit, supported by accompanying exhibitions displaying parts of the City's medieval history.

A new student community will be created by the student accommodation. This will add vibrancy, and its presence will also help other parts of the FSQ become rejuvenated with better shops and restaurants, providing a new customer base for the area.

2. **Strategic Theme 2: Creating a Connected Community**

The aim of this theme is to promote a vibrant and progressive cultural offer to attract new audiences; and to create an inclusive, innovative and sustainable business ecosystem. The proposals contribute to this theme in the following way:

- the cultural offer of a new home for the St Bride Foundation and the opening up and public access to the Whitefriars Crypt has the potential to significantly contribute to the FSQ by attracting new audiences, particularly young people, as part of the St Bride Foundation education programme.

3. **Strategic Theme 3: Clean and Green**

This theme recognises the need to make the most of the limited public squares and spaces and increase the amount of green space and access to nature, as well as tackling climate change. The Proposals contribute to this theme in the following ways:

- It provides a new and attractive landscaped public realm in the central courtyard with raised planters and seating to create pockets of social space and a venue for new conversations, assisting in general activation of the public realm.
- Retaining and upgrading the existing building with extensions and alterations is the most environmentally sustainable solution for this site, retaining over 90% of the existing structure.

4. **Strategic Team4: Safe and Secure**

This theme aims to maintain the area as a safe place to work, visit and live and stay in and the proposals contribute to this theme in the following ways:

- Putting a previously vacant and run down building back into use, and thus deterring graffiti, begging and rough sleeping on site.
- Providing active frontages that help increase the perception of safety.
- Delivering a managed public realm that will increase safety, with visible management presence and the ability to secure the site by locking it during unsociable hours.

I sincerely hope that the Committee will take these factors into account in reaching their decision on the proposal. I believe that this development will complement the new developments currently under construction and others planned for the area and will help create a new Fleet Street business district as a desirable location for businesses to locate in, residential to live and visitors to stay in and experience.

Yours sincerely,



Lady Lucy French

CEO Fleet Street Quarter BID



The Inns of Court College of Advocacy

24 September 2024

To Whom it May Concern,

RE: PLANNING APPLICATION PROPOSALS FOR 65 FLEET STREET, LONDON, EC4Y 8BQ

I write on behalf of The Inns of Court College of Advocacy (ICCA) to express support for Dominus's (as part of Whitefriars Ltd) planning application proposals that will deliver new purpose-built student accommodation (PBSA) at 65 Fleet Street (planning ref: 24/00648/FULMAJ).

About the ICCA

The ICCA is the education and training arm of The Council of the Inns of Court (COIC), which is a registered charity, working with the four Inns of Court, (Gray's Inn, Lincoln's Inn, Inner Temple and Middle Temple) to strengthen the rule of law through excellence in professional and ethical education, and to maintain the highest standards of professional conduct.

Since the 14th century, the Inns of Court have played a central role in the training of aspiring and established barristers, holding the exclusive rights to call to the Bar. Education and training are vital to the Inns' continuation, to the practice of the law, the justice system and the public's interest in general.

The ICCA is a not-for-profit organisation which provides education, guidance and coordination in relation to the pursuit of academic and professional excellence for the Bar.

Our three areas of focus are:

1. To train the barristers of the future on the ICCA Bar Course, which is a postgraduate Bar Training Course funded by the Inns of Court and validated by King's College London;
2. To provide high-quality CPD, education and training materials to practising barristers at all levels of seniority, to pupils and to other legal professionals, nationally, pan-professionally, both nationally and internationally;
3. To promote the highest standards of advocacy and professional ethics;

The Inns of Court College of Advocacy
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E: info@icca.ac.uk

The Council of the Inns of Court. Limited by Guarantee
Company Number: 8804708
Charity Number: 1155640
Registered Office:
9 Gray's Inn Square, London, WC1R 5JD

The ICCA is authorised by the Bar Standards Board (BSB) as an Education and Training Organisation (AETO). We are registered with the Office for Students and commenced Bar training in 2020.

As a not-for-profit Bar training provider, our first priority with the ICCA Bar Course is to enable every ICCA student to achieve their potential to secure pupillage and pursue a career at the Bar. 35 students studied on our first post-graduate programme in 2020/21, of whom 97% of those who applied for pupillage were successful.

The ICCA has maintained its position as the most successful provider of Bar training in respect of the BSB centralised assessments over 11 sittings, since 2021, with an average pass rate of 90.2%.

We remain true to our core values, including providing Bar training of the highest quality at the lowest sustainable cost, achieving outstanding academic and pupillage success rates, providing a Bar Course which the profession respects as directly relevant to practice and employing a fair admissions model which contributes to a more diverse entry into the profession. The ICCA attracts students and career changers from over 50 universities in a diverse and supportive community.

Our student numbers grew by 83% in 2023 and again by 17% in 2024. We will reach our capacity of 240 Part Two students per annum by 2025.

Our course cycles are distinctive in that our programme combines self-study and in-person elements. Our two in-person skills courses run from September to January and March to July.

65 Fleet Street

The 65 Fleet Street location will be very attractive to the ICCA and our students as it is so well located.

The proposed student accommodation entrance on Bouverie Street is 3 minutes' walk from some of our educational facilities at Inner Temple. Beyond this, the building is a short walk or cycle from each of the four Inns of Court, the barristers' chambers clustered within and adjacent to them and the legal quarter that surrounds all of the above.

We began talking to Dominus about these proposals at the beginning of 2024. We are currently agreeing Heads of Terms with Dominus for a Nominations Agreement that will enable at least 20 affordable rooms per annum being made available to our students. Across an academic year this means that at least 40 of our students will benefit from paying rent at levels capped by the Mayor of London. The ICCA currently has no accommodation to offer our students.

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At 2024/25 levels, the students living in this affordable accommodation will be paying circa £193 per week. Without access to an Inns funded or discounted residential scholar flat, many of our students struggle to find affordable accommodation commutable to the Inns of Court locations, and term times rarely fit neatly with the periods for which homes or rooms are available to rent. These difficulties can impact student wellbeing, which is something that we focus on significantly during the time our students are studying with us.

We are excited about the quality of accommodation being proposed. These proposals will provide our students with high-quality, professionally-managed accommodation, with a variety of attractive shared spaces and an external terrace providing opportunities for quiet study as well as mixing with other students. The mixture of uses across the development, including the St Brides Foundation cultural space and reinvigorated Tipperary pub will enhance our students' experiences.

We therefore encourage the City of London to grant planning permission for this planning application and look forward to continuing to work with Dominus bringing forward these exciting proposals.

Yours faithfully,



Lynda Gibbs KC (Hon)
Dean of the Inns of Court College of Advocacy

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From: [REDACTED]
To: [REDACTED]
Subject: RE: Planning Application Consultation: 24/00648/FULMAJ [SG37810]
Date: 17 July 2024 16:36:51
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37810

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

2TAM

NATS Safeguarding

[REDACTED]
4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Public

From: [REDACTED]
Sent: Wednesday, July 17, 2024 11:19 AM
To: NATS Safeguarding [REDACTED]
Subject: Planning Application Consultation: 24/00648/FULMAJ

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached consultation for 65 Fleet Street London EC4Y 1HT .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Emma Barral
Environment Department
City of London

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Advice to the local planning authority

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

| | |
|-----------------------------------|---|
| To LPA | City of London |
| LPA planning ref no | 24/00648/FULMAJ |
| Our ref | pgo-5560 |
| Site address | 65 Fleet Street London EC4Y 1HT |
| Proposal description | Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 871 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works. |
| Date on fire statement | 28/05/2024 |
| Date consultation received | 17/07/2024 |
| Date response sent | 30/07/2024 |

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

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

Scope of consultation

- 1.1. The above consultation relates to the redevelopment of the existing building at 65 Fleet Street to comprise of a Purpose-Built Student Accommodation (PBSA) led scheme. The building splits into two blocks on ground floor and above.
- 1.2. On levels two and above, the residential levels of the building are split into two blocks (north and south block). The north block continues up to Level 6 and is served by two escape stairs. The larger south block is served by four escape stairs up to Level 7 and three of which continue up to Level 9.
- 1.3. The north block is proposed to consist of 5 upper storeys and the south block will consist of 10 storeys above ground. The top storey of the north block will be 21m above lowest ground floor level.
- 1.4. The north block is served by two escape cores; Core A1 and Core A2. Both cores continue up to the top storey at Level 05 from ground floor.
- 1.5. The south block will be 42.5m above lowest ground level. The upper levels of the building are proposed to consist almost entirely of student accommodation with a total of 871 rooms.
- 1.6. The south block is proposed to be served by four cores:
 - Core B4 from lower ground to Level 07
 - Core B3 from lower ground to Level 9
 - Core B1 from lower ground to Level 11; and
 - Core B2 from Level 0 Level 11.
- 1.7. The ground floor of the south block is proposed to consist of student apartments as well as the main entrance to the PBSA and cultural uses.
- 1.8. The north block will include a new café / bookshop as well as refurbishment and enhancement of the existing Tipperary pub. The pub is proposed to be extended into the neighbouring building to the east.
- 1.9. The Design and Access Statement (dated June 2024 – Executive Summary) states:
“The proposed development seeks to retrofit and refurbish a derelict building to deliver a...mixed-use scheme which improves upon the existing consent while providing a long-term future for a local institution, The Tipperary.”
- 1.10. The basement is proposed to consist of student amenity areas, as well as plant areas, refuse stores and a bike store. Lower ground floor is proposed to consist of a cultural and community space in addition to student accommodation and student amenity spaces. Ground floor is proposed to consist of commercial units including the existing Tipperary pub, in addition to student accommodation and student amenity.

1.11. Residential amenity and ancillary areas will be provided across the building:
Basement – PBSA Amenity, Cycle Store, Refuse and Plant rooms.
Lower Ground Floor – PBSA Amenity
Ground Floor – PBSA Reception
Level 10 – External terrace garden

1.12. The fire statement dated 28/05/2024 states that the adopted fire safety design standards are BS 9991 and BS 9999. HSE has assessed this application on that basis. It is noted the fire statement was helpfully detailed and informative.

Listed building consent / The Tipperary pub

1.13. For information, page 14 of the Design and Access Statement (DAS) states that Listed building consent is also sought for: *“Improvements to The Tipperary pub...”*

1.14. Paragraph 2.04 of DAS informs that: *“The Tipperary Pub, dates to c.1667 and is Grade II listed. The Tipperary forms part of the north of the Site, adjoining Fleet Street.”*

Consultation

1.15. North Block: The north block will be provided with two escape cores, one of which will be a firefighting core on the basis its footprint will be less than 900m² in area.

1.16. South Block: The larger south block is proposed to be served by four cores up to Level 7, three cores up to Level 9 and two cores up to Level 10. It is proposed that Core B2, B3 and B4 will form firefighting shafts.

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

2. Supplementary information

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

Internal layout of flats

2.1. The fire statement states: *“The studio flats will generally be designed so that occupants do not have to pass within 1.8m of the cooking hob to escape. In apartments where occupants are required to pass within close proximity of cooking areas, Stove Guard devices will be provided in accordance with BS EN 50615.”*

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

Public House

- 2.3. The fire statement states: *“The top storeys of the Tipperary Pub will be served by a single stair, however this forms part of the existing situation which is not being made any worse as a result of the works. The level of safety can be deemed to be enhanced due to the provision of sprinklers.”*
- 2.4. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Basement stairs - CFD (Computational Fluid Dynamics)

- 2.5. The fire statement states: *“Three of the four escape stairs serving the residential levels will continue down to basement level in accordance with code guidance. **This includes both stairs that serve level 10**, due to the need to be provided sufficient means of escape capacity from this level. However, this is considered reasonable on the basis the stairs will be fire separated at ground floor level. It will be demonstrated through CFD at a later stage that the lobby smoke ventilation will be effective in preventing the flow of smoke into the stair for a fire in the basement and will not impact on means of escape for the upper levels.”*
- 2.6. The cited fire safety standard states that where there is more than one common stair from an upper storey or part thereof, at least one such stair serving the upper storeys (or parts thereof) should terminate at ground level. Accordingly, one of the two stairs that serve level 10 should not continue to the basement.
- 2.7. HSE acknowledges the applicant’s commitment that CFD will demonstrate (section 7 of the fire statement), that *‘the smoke extract system will be effective in preventing the flow of smoke into the escape stair...’*.
- 2.8. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Means of escape / Cycle stores


- 2.9. The Design and Access Statement (page 62) states: *“Any potential storage of e-bikes or scooters within the cycle store would need further review and potentially additional safety measures due to the increased risk of these bikes.”*
- 2.10. HSE welcomes the commitment to review and potentially add further safety measures.
- 2.11. Mobility Scooter guidance for residential buildings has been produced by the National Chief Fire Council (NFCC) which will provide guidance on fire safety provision. Further information in relation to e-bikes and e-scooter can be found at [E-bikes and e-scooters fire safety guidance - NFCC](#)
- 2.12. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Hydrants

2.13. It is not clear if the existing hydrants are currently operational. It is understood that the applicant intends to check these once there is a construction presence. Should there not be an operational hydrant within 90m, an application will be made for a new hydrant.

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

Yours sincerely


Stephen Gallagher
Fire Safety Information Assessor

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

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

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

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

applications for hazardous substances consent

London Plan policy compliance

APPLICATION COMMENT FORM**From:** Ben Bishop, Environmental Resilience Officer**Application No:** 24/00648/FULMAJ**Development Management Case Officer:** Emma Barral**Site Address:** 65 Fleet Street London EC4Y 1HT

Proposal: Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 871 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

Application Received: 21/06/2024**Request for Comment Received:** 24/07/2024**Response issued:** Date response sent**Comment:**

Application submission documents relating to climate change resilience and adaptation have been reviewed, including the Design and Access Statement, Sustainability Statement, Energy and Sustainability Assessment, Ecology Appraisal and Landscape Statement.

A Climate Change Resilience and Sustainability Statement has not been prepared and supplied at this stage and should be considered and delivered as part of the WST 05 BREEAM credit.

Overheating

- Energy and Sustainability Assessment prepared by Applied Energy
- DSY 2 & 3 weather files, caveat of mitigation strategy to enable future compliance and adaptation to account for future climate
- greenfield runoff rate for the 1 in 100-year storm
- TM59 has been used to evaluate student halls to begin to identify cooling measures, requires further assessment to take into account future climate.
- TM52 should be assessed for retail and other use types.
- At RIBA 3 development will incorporate a range of measures to minimise contributions to the urban heat island aligning with London Plan Policy SI 4.
- Solar shading and passive design measures
- Urban greening for evaporative cooling.
- Passive ventilation and heat recovery
- Minimise reliance on cooling systems.
- Use thermal mass to moderate temperature fluctuations.

Date &
Initials

APPLICATION COMMENT FORM

- Would be recommended to identify potential to provide future cool spaces for pedestrian and visitor comfort.

Flooding

- Flood risk and drainage strategy prepared by Meinhardt
- Site is located in Flood Risk Zone 1 with less than 0.1% chance of river or sea flooding.
- Site is considered low risk from ground water flooding.
- Greenfield run-off rate of 2.2l/s for 1 in 100 year storm event with an allowance of 40% for climate change.

Water Stress

- Flood risk and drainage strategy prepared by Meinhardt
- Water re-use proposed in drainage strategy prioritising irrigation, infiltration and attenuation.
- Surface water falling onto proposed development to be routed into attenuation tanks.

Biodiversity

- Landscape statement prepared by B | D Landscape Architects
- Ecology Appraisal prepared by Hilson Moran
- Proposed Urban Greening Factor of 0.301.
- No BNG assessment or strategy supplied.
- Use of extensive green/brown roofs has potential to provide positive biodiversity benefits for City of London target species.
- Variation in substrate depth and type welcomed to create a range of habitat niches and increase plant diversity.
- In BNG assessment further artificial measures should be proposed including nest boxes, invertebrate mounds/bee banks rocky piles and areas of standing water.

Pests and Diseases

- No evidence supplied, can be covered in the Climate Change Resilience Sustainability Statement (CCRSS) to be supplied as part of the condition proposed below.

Food, Trade, and Infrastructure

- As a residential use type the development should be assessed for risk to occupants based on the potential risk to supply chains, access and infrastructure failure. Can be covered in CCRSS

Recommendation:

The proposed development **is partially** compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2036 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2036 Policies CR1 and CR2.

The following condition should also be considered to provide details of how the development has responded to risks from climate change; this condition may be fulfilled by a satisfactory assessment in support of the BREEAM Wst 05 credit:

APPLICATION COMMENT FORM

Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flooding, 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 and managed in accordance with the approved CCRSS for the life of the development.

BB
01/08/24



Ms Emma Barral
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 0207 973 3777

Our ref: P01580083

5 August 2024

Dear Ms Barral

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

**65 FLEET STREET LONDON EC4Y 1HT
Application No. 24/00648/FULMAJ**

Thank you for your letter of 17 July 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The proposals are for the recladding and extension of a group of buildings in the City of London. The site is located within an area that has a rich tapestry of heritage. It is situated partly within the Fleet Street Conservation Area and contains two grade II listed buildings. It is also located in close proximity to other heritage assets, including the Temples and Whitefriars Conservation Areas and the grade I listed Church of St. Bride's.

In our view, the proposals are unlikely to harm the character and appearance of the Fleet Street conservation area and have the potential to enhance the significance of the listed remains of the Whitefriars Convent. The proposals also have the potential to impact on the significance of heritage assets outside of the site through development within their setting. We recommend that further clarity is provided on those impacts and that any harm to heritage assets is adequately justified or mitigated, in accordance with policy.

Background

We understand that planning permission has been granted for a scheme of alteration and extension to the existing buildings on this site, including provision of a large roof addition over the building on the south side of the site.

Significance

The site is located on the south side of Fleet Street and comprises two blocks of



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Telephone 020 7973 3700
HistoricEngland.org.uk

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buildings separated by a courtyard and alleyways. The site is bounded by the narrow thoroughfares of Bouverie Street to the west and Whitefriars Street to the east, and by an existing adjacent building to the south. The northernmost block is located within the boundaries of the Fleet Street Conservation Area, which is typically characterised by buildings from a wide range of periods, many of which have historic associations with the newspaper industry. This block includes four buildings that front onto Fleet Street as follows:

- Two early 20th century office buildings that turn the corners onto Whitefriars Street and Bouverie Street. These buildings are finished in high quality stonework with carved detailing. Both buildings are considered to make a positive contribution to the character and appearance of the Fleet Street Conservation Area.
- The Tipperary public house, which has origins back to the 17th century. Although altered in the 19th and 20th centuries, the building retains its original plot width and modestly proportioned street frontage. In recognition of the heritage significance of the pub it is listed at grade II.
- At the centre of the block is a postmodern development that references the general scale and form of the surrounding buildings and provides an arched entrance way to the courtyard behind.

The southernmost block is occupied by a large building that dates from the 1990s. To the south of the block, the historic narrow thoroughfares of Magpie Alley and Ashentree Court are retained, as well as the partial remains of the former Whitefriars Convent. These remains are incorporated into the basement of the existing building on the site and include the medieval vault of the former convent, possibly dating to the 14th Century, and a small stone chamber with curved stair, probably dating to the 16th Century. In recognition of the early date and rare survival of this fabric, the structure is listed at grade II.

In the wider setting of the site are a number of conservation areas, including the Temples Conservation Area, which lies to the west and includes an enclave of late 17th Century barrister's chambers around King's Bench Walk, listed at Grade I. The Whitefriars Conservation Area lies to the south and includes a number of early 20th century newspaper printing offices, many of which are listed as fine examples of office and manufacturing premises. To the east of the site is St. Bride's Church, which is one of Sir Christopher Wren's greatest City churches. It dates from 1670-84 and has a notable tiered spire that apparently inspired the form of the wedding cake. In recognition of its high heritage significance it is listed at grade I. The above-mentioned heritage assets feature in many views originating from the River Thames, with the spire of St. Brides forming a particular point of interest.



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Impact

The proposals are for the remodelling and extension of the existing buildings on the site.

To the northernmost block, the buildings are proposed to be extended at roof level in the form of mansard extensions, whilst the existing postmodern building would be re-clad.

Subject to the quality of design and execution, these proposals are unlikely to have a harmful impact on the character and appearance of the Fleet Street Conservation Area.

The south building would be re-clad and extended at roof level. The proposed extension is likely to be visible in views from the neighbouring Temples Conservation Area and would appear on the skyline behind buildings on the east side of King's Bench Walk. We note that existing developments are visible in the backdrop setting of these buildings in longer views from the west and the previous planning permission did introduce development into this area of sky space. As such, the proposed roof extension will appear on the skyline and will distract from the architectural composition of the buildings in King's Bench Walk. As such, the proposals are considered to cause a low degree of harm to the significance of the affected heritage assets through development within their setting.

In relation to the Whitefriars Conservation Area, any proposed visual impacts within the immediate area of the site are likely to be minimal due to the relatively narrow widths of the surrounding streets, which afford limited views of the site.

The submitted Heritage, Townscape and Visual Impact Assessment includes a series of images of the proposals from various vantage points along the Thames, which are intended to illustrate the potential visibility of the proposals in a number of significant views of the of the Temples and Whitefriars Conservation Areas and the church of St. Bride's. However, those images are of a very low resolution and it is not possible to assess the impact of the proposals with any certainty. Whilst we do not consider the proposals to raise any significant concerns in relation to the setting of the conservation areas as experienced in these views, it is clear that the proposed roof extension would be seen in close proximity to the church spire of St. Brides. Where any part of the spire of the church is proposed to be partially blocked from view, the proposals have the potential to cause harm to the significance of the church through development within its setting.

To the Ashentree Court elevation, the façade of the southern building would be partly



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remodelled and extended to provide greater visibility of the remains of the former Whitefriars Convent. A new accessible public entrance would also be provided direct access off Ashentree Court. Subject to details of design of the new extension and any works to the fabric of the historic structure, the proposals have the potential to enhance the significance of the remains.

Relevant Planning Policy

The 1990 Planning (Listed Buildings and Conservation Areas) Act makes it a statutory duty for a planning authority to give special regard to the desirability of preserving listed buildings or their setting (section 16 and 66) when making decisions which affect them.

The development plan for this area is the City of London Local Plan 2015. Relevant policies include: CS10 and DM10.1, which relate to design and refer to heritage as a consideration; policies CS12 and DM12.1, which relate to the conservation and enhancement of the City's heritage and the management of change to those assets and their settings; and CS13 which relates to important views and notes the spire of St. Bride's Church.

The strategic policy framework for London is set out in the London Plan. Its policy HC1(C) on heritage conservation and growth reinforces the requirement for development proposals affecting heritage assets to be sympathetic to their significance and appreciation, and to avoid harm. It justifies this by explaining the unique sense of place created by London's historic environment, and the irreplaceable nature of its heritage assets.

Guidance on the fulfilment of statutory planning duties is set out in the government's National Planning Policy Framework 2023 (NPPF). The NPPF makes clear that when considering the impact of a scheme, any conflict with the conservation of heritage assets should be avoided or minimised (para.201). Great weight should be given to the conservation of heritage assets, and this weight should be greater for the most important assets (para.205). Clear and convincing justification should be provided for any harm caused (para.206), and any harm should be weighed against the public benefits of the scheme (para.208).

Position

Historic England welcomes the opportunity to comment on these proposals.

The proposals appear have the potential to enhance the character and appearance of the northmost street block that fronts onto Fleet Street, subject to the quality of the final design and detailing.

The proposed works to the former Whitefriars Convent remains have the potential to enhance the presentation of this important listed historic structure and could enable



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greater public access and understanding. We would therefore encourage you to enter into a S106 agreement to secure these potential heritage benefits, including any necessary works of repair to the historic structure, future maintenance, public access and interpretation

We would also recommend that options are explored for linking the proposed new internal space around the former convent remains to other publicly-accessible activities. For example, the London Wall at Vine Street has a linked café space that ensures that the public have visibility of the wall, that the space is well staffed, and is welcoming to the public.

We consider the proposed roof extension over the south building to cause a low level of harm to the significance of the Temples Conservation Area and the listed buildings within King's Bench Walk. In accordance with relevant policies, we would recommend that your authority seek to ensure that this harm is justified and reduced or minimised as far as possible.

In respect to the impact of the proposals on the ability to see the tower of St. Bride's Church in views from the Thames, we would recommend that the proposals seek to ensure there is no blocking or obscuring of the church spire in these views (for clarity, beyond the extent of any existing buildings or permitted schemes). As mentioned in the Impact section above, such proposals have the potential to cause harm to the significance of the church through development within its setting and in our view, such harm should be avoided, bearing in mind that the church is a grade I heritage asset of the highest significance.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 201, 205 and 208 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the



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Historic England

Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

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

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

Yours sincerely

Claire Brady

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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From:
To:
Subject: Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ
Date: 08 August 2024 12:42:25

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ
8 August 2024

Dear Sir/Madam

Re: 65, FLEET STREET, LONDON, EC4Y 1HT

Waste Comments

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe 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 and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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

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

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

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

Water Comments

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

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

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

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ Tel:020 3577 9998 Email: devcon.team@thameswater.co.uk

Visit us online www.thameswater.co.uk , follow us on twitter www.twitter.com/thameswater or find us on www.facebook.com/thameswater. We're happy to help you 24/7.

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From: [REDACTED]
To: [REDACTED]
Subject: FW: 65 Fleet Street - 24/00648/FULMAJ, 24/00756/MDC & 24/00757/MDC
Date: 15 August 2024 15:58:57
Attachments: [image002.png](#)
[image003.png](#)

Hello,

Please scan and save as sensitive to 24/00648/FULMAJ.

Kind Regards

Emma



Emma Kate Barral MRTPI | Planning Officer
Environment Department | City of London | Guildhall | London EC2V 7HH



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From: Elliott, Chris <[REDACTED]>
Sent: Monday, August 12, 2024 4:16 PM
To: Barral, Emma <[REDACTED]>; McBirney, Georgia
<[REDACTED]>
Cc: Flynn, James <[REDACTED]>; Begolli, Nora
<[REDACTED]>
Subject: 65 Fleet Street - 24/00648/FULMAJ, 24/00756/MDC & 24/00757/MDC

Hi Emma and Georgia,

I'm emailing you both as I believe you are a case officer for 65 Fleet Street project, but apologies if this is not in your remit.

I met with James earlier today to discuss some delivery and servicing aspects, I just wanted to raise a couple queries that should go back to the applicant.

In the Delivery and Servicing Management Plan (DSMP), Figures 4.1 and 4.2 should

include the disabled parking bay and motorcycle spaces opposite the entrances to the service yard, within the drawing. This could create conflict for delivery vehicles wanting to access the service yard, as they have shown in their swept path analysis, if a vehicle is parked in the disabled bay.

I would also like to see the outputs of the TRICS assessment that the applicant has submitted, as part of their DSMP, just to make sure we are satisfied with their proposed delivery/servicing trip rates.

Finally, if the applicant would be able to provide estimates on the frequency of delivery activity, per vehicle type (4.6tn and 7.5tn box van). I am not 100% comfortable with the 7.5tn box van having to reverse into the service yard, in order to make deliveries, as they have shown in the swept path analysis (Fig 4.2).

Best,
Chris



Chris Elliott MRTPI | Transport Planner (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
[Redacted] www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment



-
-



Memo

To Assistant Director (Development Management)
Environment Department

Email [REDACTED]

From Paul Bentley
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date: 13/08/24

Your Ref: 24/00648/FULMAJ

Subject: 65 Fleet Street London EC4Y 1HT

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 871 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

The proposed development will be car free and space/ water heating will not be provided from a combustion source which is welcomed. No details regarding the proposed backup generator are known at this stage (to be confirmed at Stage 3). This will need to be assessed and therefore all relevant conditions have been applied.

Should the development be approved please attach the following conditions:

Air Quality Neutral Assessment

A revised air quality neutral assessment that considers the building and transport emissions must be submitted. The air quality neutral assessment must follow the latest air quality neutral guidance.

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 S11 Improving Air Quality Part B(2)(a) and E of the London Plan

Condition M26F

Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the operation of the building.

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, London Plan policies SI1, SI3 D, and SD4 D

Condition M28C amended

Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must be the latest Euro standard available. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time.

Reason

In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

Condition M29

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.

Condition M32 NRMM

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

Reason

To reduce the emissions of construction and demolition in accordance with London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Roof gardens

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.

In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

Compliance with the Clean Air Act 1993

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

Generators and combustion plant

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



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Tele phone [REDACTED]

Email [REDACTED]

Date 22/08/2024

Our Ref DS/SUDS24/0045

Your Ref PT_EB/24/00648/FULMA J

Subject 65 Fleet Street London EC4Y 1HT

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

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

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

- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems (including green-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 2.2l/s from each outfall and from no more than two distinct outfalls, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 590m³;
- (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) A Lifetime Maintenance Plan for the SuDS system to include:
 - A full description of how the system would work, it's aims and objectives and the flow control arrangements;
 - A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.



Your ref: 24/00648/FULMAJ

Our ref: CITY/24/34

Emma Barral

Development Management, City of London Corporation

By email only to: [REDACTED]

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

www.tfl.gov.uk

RE: 24/00648/FULMAJ, 65 Fleet Street, City of London, EC4Y 1HT

Thank you for consulting TfL with regard to this planning application reference 23/01102/FULMAJ.

Site Location

The site of the proposed development is located on Fleet Street 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 is also bound by Whitefriars Street to the east and Bouverie Street to the west and Tudor Street to the south, all forming part of the City of London road network.

Bouverie Street operates a one-way system southbound off Fleet Street and Whitefriars Street operates one way north bound onto Fleet Street with the exception of cyclists both ways.

The site is also located approximately 190m west of the A201, New Bridge Street which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

The nearest bus stop is located on Fleet Street adjacent to the site named Fetter Lane, serving routes 15, 17, 26, 40, 63, 76, 341, N15, N21, N26, N63, N89, N199, N550, N551.

The closest station to the site is also Liverpool Street which serves the Central, Circle, Hammersmith & City, Metropolitan and Elizabeth Lines as well as Overground and National Rail services.

The site has a Public Transport Access Level (PTAL) of 6b on a scale from 0 to 6b where 0 is the lowest and 6b is the highest, therefore the site rank is excellent in terms of accessibility.

Cycleway 6 is located on New Bridge Street, 190m from the site, connecting Elephant and Castle to Hampstead.

The nearest station is City Thames Link approximately 285 metres east of the site along Fleet Street. The nearest London Underground station is Blackfriars at approximately 430 metres southeast and Temple station approximately 700 south west, both serving the District Line, Circle Line and Blackfriars also serving national rail.

The nearest cycle hire docking station is Bouverie Street directly outside of the site.

Neighbouring sites

It should be noted that there is a consented application for 'Land bounded by Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street'.

This site secured the closure of Shoe Lane (Stop H) bus stop located on Fleet Street directly outside of the site and has been relocated and secured via S278 agreement with TfL.

Throughout the construction there is a narrow gantry designed to enable pedestrian movement on the footway along Fleet Street, with a pitlane along Fleet Street meeting the junction adjacent to the site and Whitefriars Street. If a gantry must be retained for construction at this site, we request installation of a wider gantry with improved lighting, as the current arrangement is narrow and dark even in daylight, which is not sufficiently inclusive.

Consented scheme

A previously consented planning application (Planning ref. 19/00058/FULMAJ) was to re-provide an office-led scheme with some retail floorspace for the ground and first floors to the north of the building and flexible retail/gym/office uses at lower ground floor level.

The consented scheme was to provide a total of 32,144sqm GIA, an uplift of 1,350 sqm GIA from the existing floor area.

The existing public house is to be retained in the new application, whereas the previously consented application proposed to remove it.

Site access

Pedestrian access

There is an existing courtyard within the site connecting Bouverie Street and Whitefriars Street, which will be retained, TfL request clarity on the status of this access point. We also request whether the access will be 24/7 access in line with Policy D8 and the Public London Charter.

TfL request that new access points for the site should improve current natural surveillance and street lighting. The main access for the student accommodation will be on Bouverie Street. Given the access is off the main road network at Fleet Street, safety for the students should be prioritized and carefully considered.

Cycle access

Cyclists would access the site via Whitefriars Street providing access to basement level cycle parking using the existing servicing ramp. As well as the ramp, a cycle lift

is proposed which is described as for disabled cyclists to use. The lift should be match minimum dimensions specified in the London Cycle Design Standards (LCDS), specifically 1.2 by 2.3 metres, with a minimum door opening of 1000mm. For further guidance see: <https://content.tfl.gov.uk/lclds-chapter8-cycleparking.pdf>

Given that student accommodation is the primary use proposed for the site, further analysis is needed to show how the relationship from the site to local Cycleways will be improved, as required by London Plan policy T5. Specifically S278 works should include the entire link route from the site to Cycleway 6 at New Bridge Street, 190m away, all of which must be assessed against and if necessary improved to comply with the Cycle Route Quality Criteria (<https://content.tfl.gov.uk/cycle-route-quality-criteria-technical-note-v1.pdf>) This can identify any works required to link routes in the local highway network to stitch the development into local and London-wide cycling networks.

Lastly, further clarification should also be given to demonstrate how the condition of Bouverie Street and Whitefriars Street will be enhanced to provide a better walking and cycling experience, especially adjacent to delivery and servicing access points. This is necessary to ensure compliance with London Plan policies T2 and D8. Specific enhancements should be secured to ensure delivery by section 278 (S278) agreement or section 106 (S106) contribution to Corporation-delivered local highway works.

RSA and Healthy Streets Check for Designers

The Mayor's Healthy Streets and Vision Zero approaches are essential to delivering good growth in London and increasing travel by walking, cycling and public transport, as required by London Plan policies GG3, T1, T2 and others.

TfL expects all streets and public realm within and around the site to be designed in line with these approaches to help achieve the outcomes of the Mayor's Transport Strategy (MTS), which is also explicitly referenced in London Plan policy.

Considering this, we recommend that the proposed highway works are designed up in further detail to enable a Stage 1 Road Safety Audit (RSA) and Designer's Response and Healthy Streets Check for Designers prior to determination.

These assessments should be audited and approved by TfL and the City Corporation's transport team before they are considered valid and considered by relevant planning decision makers at the City.

Active Travel Zone Assessment (ATZ)

The ATZ includes a day time assessment which is welcomed by TfL however, since the previously consented application, TfL now requires a 'night-time/dark hours' ATZ assessment is submitted to gain a true assessment of the walking environment paying particular attention to Healthy Streets criteria 'People feel Safe'. TfL is committed to improving women's safety, and delivering the Mayor's Strategy to Reduce Violence Against Women and Girls. For information on the issue, TfL also recommends the newly published GLA guidance: Safety in Public Space; Women, Girls and Gender Diverse People.

The daytime ATZ has been completed between 9:30-10:30 AM, assessing four routes, destination in order of route being; City Thameslink Station, LSE University Library, Chancery Lane Underground Station, Blackfriars Underground Railway Station.

To summarise the ATZ assessment, no improvements were suggested for Route 1. Route 2 identified an area of footway on Carey Street where tactile paving needs to be added. Route 3 identified the worst section being the footway prior to the Rolls Building / Fetter Lane crossing, due to Lime Bikes presence reducing the footway, which could negatively impact pedestrians who require a wider pavement such as those with pushchairs and wheelchairs. Route 4 also requires some tactile paving on the crossing at the south section of Whitefriars Street, as well as the repainting of cycle lanes to stop cyclist confusion, which is especially required given this street is where the long stay cycle parking is proposed to be accessed.

A Vision Zero analysis has been provided which confirms there have been no fatal collisions across 2020-2022 along local ATZ routes assessed, but two collision clusters of multiple serious injuries.

The first is at the crossing at the eastern end of Fleet Street, part of journey one, and the second at the crossing at the eastern end of Tudor Street, part of journey four. We therefore recommend requests the applicant engages with the City of London as the highway authority to agree highway safety improvements at these locations, meaning specific appropriate works and sufficient applicant funding.

Public Realm and placemaking

TfL request further clarification to demonstrate the relationship between the public and private spaces and how the function and hierarchy of the public realm could integrate with the land use and building blocks.

The site should operate in line with London Plan policy D8 and the Public London Charter, which highlights that all public and semi-public spaces in London should be safe, accessible, inclusive, attractive, well-connected, and easy to understand – even if privately managed, they should read as public spaces and be subject to the same rules.

We have safety concerns about the path proposed between Ashentree Court and Magpie Alley, which is poorly lit. This space needs further design attention to ensure it is safe, with appropriate street furniture and security management in place, in line with the Healthy Streets principles and policies T2 and D8 of the London Plan.

The development also needs a clear wayfinding system at key access points in the public realm to lead people to local destinations. We would be happy to support provision of Legible London signage within the site, subject to applicant funding. The City may wish to secure a wayfinding signage scheme by condition or another appropriate planning obligation, with future costing, design and delivery by TfL, prior to occupation.

Trip Generation

A multi-modal trip generation has been undertaken to assess and quantify the potential impact of the proposed development in terms of the number of trips expected to be generated by the development.

The report claims a reduction in trips, thus no impact. However, the development will clearly result in an increase in trips between 19:00 – 24:00, given the proposed change from office to student accommodation. There may also be an increase in public transport trips away from the development at AM peak hours.

Overall the site is expected to generate a total of 3176 two way trips including 1808 pedestrian and 1053 trips London Underground (LU) and National Rail trips. The application argues this is expected to be 3412 fewer daily trips than the site's existing land use.

Delivery and servicing trips appear to have been severely underestimated for the student accommodation proposed and overestimated for the other uses. This should be addressed. The projection of 28 deliveries per day for over 900 student accommodation units is completely unrealistic.

The mode share of just 6% for cycling is also too low for a car free site in the City of London. This should be increased to make the analysis robust and enable negotiation and agreement of suitable mitigation. The site is well connected to cycleways (C6 on New Bridge Street) and will have the maximum provision of long stay parking, which can cater for a mode share of at least 19%.

Pedestrian Comfort Levels (PCLs)

We request the applicant conducts a PCL assessment as walking is projected to make up 59% of trips and given the proposed land use for the site will be a favourable mode of travel. This should include full assessment of the crossings at the junctions of Whitefriars Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, and Bouverie Street / Tudor Street.

Ludgate Circus should also be assessed as it is on the main route to City Thameslink Station. Please see the attached link for further information <https://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf>

Cycle Parking

The cycle parking proposed would comply with London Plan Policy T5, whereby there are to be 653 long stay spaces for the student accommodation and six for the other site uses. 22 short stay spaces are proposed for the student accommodation which also meets London Plan standards.

For the other uses 26 short stay spaces are proposed for the non food retail / gallery use and 26 for the retained public house. This is also supported

The TA details that 5% of all cycle parking will be provided as Sheffield stands to accommodate for larger / adapted cycles, in line with LCDS.

The cycle parking should be secured by condition and discharged in consultation with TfL. Details on bay width, access aisle width and spacing between stands should be provided, to confirm compliance with the standards in figure 8.1 of the London Cycling Design Standards (LCDS).

Cycle hire

The TA details that an under provision of short stay for the non-student accommodation short stay could be provided through expanding the current cycle parking facilities on Bouverie Street.

Given the nature of the site, we request a contribution of £100,000 to increasing capacity of the existing docking station, to support and promote active travel to and from the site.

Car parking

Given the site has the highest PTAL of 6b, TfL welcome that the site is car free. The site is proposed to have one blue badge parking space located off Bouverie Street. Despite proposed access by reversing in, subject to local highway authority support on balance this is acceptable.

TfL welcome that the blue badge space will have an Electric Vehicle Charging Point (EVCP) from the outset and request for a Parking Design and Management Plan, in line with London Plan Policy T6 to identify where additional blue badge spaces could be provided if demand exceeds current requirements.

Delivery and Servicing

A draft Delivery and Servicing Management Plan (DSP) has been submitted with the documents. The final DSP should be secured by condition.

The existing basement servicing yard can only accommodate small vans no larger than 4.5t. Therefore, proposals detail that on street provision is required on Whitefriars Street.

TfL highlight that London Plan Policy T7 identifies that on street provision is only accepted when off street is not possible and understand that work has been done to prove larger vehicles cannot be accommodated for in the service yard. The TA details four options to mitigate on street servicing, including reversing into the servicing yard, weight limits, lengthening and increasing the depth of the servicing yard. All options were discounted.

In conclusion it was identified that Option 1 (reversing) was considered the most viable, TfL do not accept reversing off the TLRN or SRN, however given access is proposed from a City of London road, this is a matter for the local highway authority.

TfL would be supportive of a high percentage of deliveries being consolidated prior to entering the site, to reduce the number of deliveries and be more sustainable.

Provision should be made to accommodate and encourage cargo bike access via Bouverie Street (the main entrance for the student accommodation). We request cycle parking stands for these types of deliveries, to prevent any blocking of vehicles / pedestrians on Bouverie Street.

Travel plan

A framework Travel Plan has been submitted with the TA this includes a student and staff mode split. As mentioned above the 6% expected baseline mode share for cycling is unacceptable, and the Travel Plan target to increase cycling by occupants by only 4% to 10% over five years is also insufficiently ambitious and must be increased.

We strongly encourage the City to consider securing funding for Cycle Hire memberships as part of the planning obligations for this development.

The Travel Plan should be secured, implemented and monitored as part of any Section 106 agreement. We also recommend that the applicant provides a staff travel plan for construction of the development.

Student move in and out strategy

A Student Move In / Out Strategy is to be prepared and we request to review the final plans once finalised. TfL should be consulted on discharge if this is secured by a separate condition to the DS and Travel Plans.

A booking system is proposed to be implemented for the site whereby cars will be parked on a stretch of 75 metres of Bouverie Street, where a single yellow line permits loading and unloading for up to 40 minutes. The students will be contacted prior to arrival to provide detail of their travel arrangements, enabling a time slot to be booked if arriving by car.

We are very concerned about the proposed arrangement due to bus operations and request that staff ensure no queuing and parking on Fleet Street. If cars arrive early they must leave the area and return at their appointed time.

Construction Management

The current Construction Logistics Plan (CLP) sets out indicative Traffic Management plan layout for Fleet Street during site construction, the final CLP should be secured by condition.

The indicative Programme Timescale indicated has an overlap with the neighbouring Sailsbury Square development, due for completion in early 2027. The applicant should therefore work in collaboration with the developers of this site to streamline access and reduce collective highway network impact. The applicant should aim to mirror the existing pit lane width and operation at a 3.2m width, rather than using a wider pitlane of 3.6 metres.

The applicant should look at off-site holding area locations that could be utilised to avoid a situation where there is delay for vehicles accessing the pit lane, that may block the nearby pedestrian crossing and cause traffic queuing.

The applicant should coordinate with TfL and the City of London to ensure that suitable provisions, such as optimised signal timings further along Fleet Street, can be made to accommodate the loss of the pedestrian crossing in the immediate vicinity of the site during the works.

TfL should be consulted once a contractor has been appointed the finalised pit lane layout emerges, as Fleet Street is on the Strategic Road Network (SRN). This includes detailing any changes to existing road widths and demonstrating that access to the adjacent bus stop Fleet Street (Stop 8570, Fetter Lane) will be safely maintained for both buses and pedestrians, which should be demonstrated showing a swept path of an electric bus stopping at this location.

For the new wider pitlane being proposed, as a worst case scenario, TfL request swept paths of two electric buses passing each other.

The indicative pit lane layout shows a potential user conflict at the kerb of Whitefriars Road and Fleet Street when Articulated Vehicles enter the pit lane. Marshal locations should therefore clearly be demonstrated in the final Traffic Management Plans.

The CLP shows Route 2 involves exiting off Fleet Street onto Bouverie Street leading to Tudor Street and onto New Bridge Street, located south of the site. We have strong concerns on this proposed routing as it uses an uncontrolled road and a give way across Cycleway 6 to give way onto New Bridge street. We would not support any construction access via this route during weekday tidal cycling peaks.

Summary

Further clarity is required on the status of access to the courtyard within the site connecting Bouverie Street and Whitefriars Street

Further information on the design of the cycle parking, including lift dimensions.

A nighttime / dark hours ATZ using the same routes as the daytime completed ATZ.

Stage 1 Road Safety Audit (RSA) and Designer's Response and Healthy Streets Check for Designers for all proposed highway works prior to determination.

Further clarity is needed on the relationship between public and private space within the site.

We would be supportive of implementing a new wayfinding strategy featuring Legible London signage.

TfL must be consulted on discharge of the Student Move In Move Out Strategy.

The routes from the site to Cycleway 6 should be assessed against the Cycle Route Quality Criteria.

We request a PCL assessment of crossings at the junction of Whitefriars Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, Bouverie Street, Tudor Street.

We request a contribution of £100,000 to increasing capacity of the existing docking station on Bouverie Street.

Further consultation with TfL is required regarding construction plans, pitlanes and impact on Fleet Street.

The final DSP, CLP and Travel Plan should be secured by condition. The Travel Plan requires more ambitious targets and funding for measures including free Cycle Hire memberships for future residents.



Concerning 65 Fleet Street Development proposal.

Planning Application PT_EB/24/00648/FULMAJ

Dear City of London Planning Team,

The City of London Police have inspected/reviewed the planned Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works on the current site of 65 Fleet Street London EC4Y 1HT.

The current proposals whilst generally acceptable, we have raised a number of concerns within the development, which will directly impact on the safety and security of the build and have a likelihood of affecting the community.

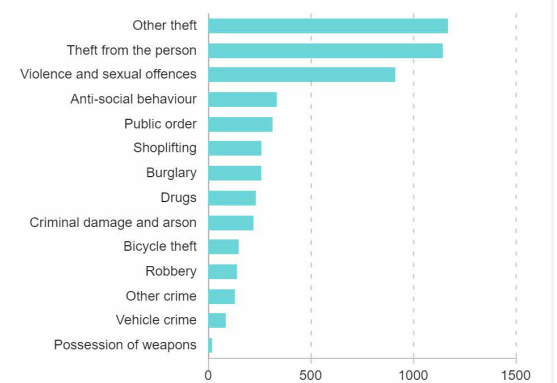
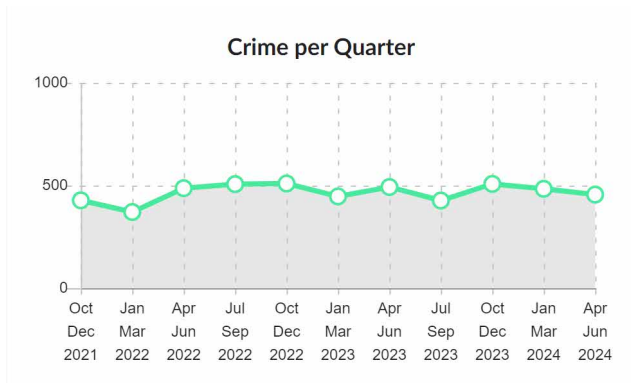
Looking at the current crime statistics for the local area, burglary, antisocial behaviour and a wide range of offences they are on par with the majority of wards within the City of London, but with the proposed redevelopment of venues within the zone will no doubt increase the footfall and ergo the crime levels.

Burglary within the western side of the City of London has been consistently higher and the primary means of burglary has been artifice burglary or daytime walk in burglaries.

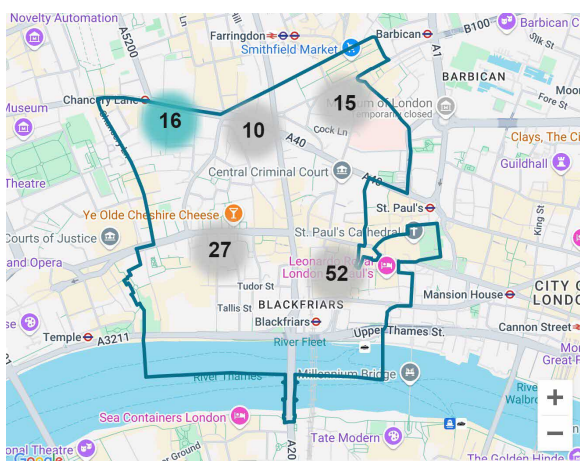
Vagrancy within this area of the City, being such a close neighbour to the London borough of Westminster has again been consistently high over the years which does bring a certain amount of associated antisocial behaviour.

Theft offences, particularly theft from the person was a prevalent offence. This development will no doubt increase the opportunity of crime within the local area.

I have included a snapshot of crime over the past 3 years to display crime patterns over the wards associated.



A snapshot from the month of July 2024 will show typical offending patterns throughout the year.



This area within the City of London is a mix of new development and historically significant buildings and alleyways. The main focus area is currently in a high state of development and it is essential that this site is held in keeping with the high standards of security and maintenance of neighbouring buildings, one of note will be the Salisbury Square development, housing the new Police Headquarters and Courts within the City of London.

Internally within the site, we would recommend further compartmentation to ensure that penetration into the site would be limited.

Due to the high number of student domiciles that have been proposed to be included into the development, City of London Police feel that it would be appropriate and proportionate to apply a condition of build to the project, that they secure a minimum of Silver Award certificate of secured by design for homes. This will help to ensure that the residents and common users will have an enhanced feeling of safety and security inside of their abodes.

Similar student accommodation sites within the City of London area have already decided to include SBD as a standard within their build environments. It has been noted that new

Student accommodation that has achieved Secured By Design have seen a dramatically lower crime output than comparable sites without accreditation.

Older adjacent sites within the local area of Fleet Street have seen the introduction of retrofitted additional security measures. The security measures that have been introduced would draw an inference that they were necessary to safeguard residents and commercial buildings due to reported crime and antisocial behaviour within the area.

Within the plans are proposals for further retail and commercial office spaces, again we would recommend that the developers be conditioned to build these integrated units to achieve a minimum Silver Award of Secured by Design Commercial.

As a result of our review we would appeal/invite City of London Planning Team to consider the proposed conditions for build.

To assist the development in achieving Secured by Design accreditation, I would seek to have Secured by Design conditions attached to any permission that may be granted in connection with this application.

The wording such that the development will follow the principles and physical security requirements to be submitted and approved in writing by planning pre-commencement, and will achieve Secured by Design accreditation prior to occupation, and be maintained thereafter. This would include the residential portion of the build meeting the SBD Homes Guide 2023 and the Commercial Venue meeting the SBD Commercial Guide 2023.

The proposed conditions are in keeping with the City of London Local Plan 2015 and proposed Plan for 2040.

The City of London Local Plan 2015

Policy DM 3.2 Security measures in new developments and around existing buildings To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

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

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

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;

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;

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;

an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

3.3.8 Design & Access Statements accompanying applications should meet the recommendations of the ALO and set out how security matters have been considered at the design stage. New development should incorporate “Secured by Design” (SBD) principles. The design should fully incorporate protective security requirements within the site boundary, as far as practicable. Building designs should provide for a high level of natural surveillance of all surrounding public areas and highway.

3.3.9 Incorporating security measures early in the design of new development or the refurbishment of existing buildings will avoid the need for later retro-fitting of security measures, which can impact on the architectural quality and design of the development.

3.3.10 All new developments need to maximise the level of security provision to reduce the risk and the likely impact. It is not always possible to provide security measures wholly within the building or development site, particularly when there is a need to provide stand-off distances to protect against potential vehicle-borne attacks, or where the building line is immediately bounded by public highway. Security features on the public highway should be considered as a last resort when all other alternative proposals have been exhausted.

Achieving Safe spaces to prevent domestic violence

Within the City of London Violence against Women and Girls Strategy, the City of London committed to providing accommodation suitable and capable of ensuring a victim of domestic violence or abuse had the feeling of safety within their home.

Regional Planning Policy – The London Plan 2021

3.11.2 New developments, including building refurbishments, should be constructed with resilience at the heart of their design. In particular they should incorporate appropriate fire safety solutions and represent best practice in fire safety planning in both design and management. The London Fire Commissioner should be consulted early in the design process to ensure major developments have fire safety solutions built-in. Flooding issues and designing out the effects of flooding are addressed in Chapter 9.

3.11.3 Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme³⁴ published by the Police. Further guidance is provided by Government on security design³⁵. This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

3.11.4 By drawing upon current Counter Terrorism principles, new development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the

probability of their detection, and delay/disrupt their activity until an appropriate response can be deployed. Consideration should be given to physical, personnel and electronic security (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan/City of London Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

National Planning Policy Framework

Paragraph 98-107 within the National Planning Policy Framework explains the need and expectation to achieve well designed and safe environments that do not allow or permit the growth of crime and antisocial behaviour, by creating safe environments for residents and workers within a community. Security within the built environment is essential for ensuring that communities within the City of London can feel safe.

Under the Crime and Disorder Act '98, local authorities have a duty/statutory requirement to work with the police to reduce crime and disorder, which has been held to apply to the planning process.

City of London Police would be pleased and happy to assist with the developers on this scheme to achieve accredited status with Secured by Design.

PC Russell Pengelly

Design Out Crime Officer/Architectural Liaison Officer - ASB/Crime Prevention Advisor

Partnerships and Prevention Hub

City of London Police | Bishopsgate Police Station | 182 Bishopsgate, London, EC2M

4NP T: [REDACTED] - Mobile :-

Email: [REDACTED]

**CITY OF LONDON
POLICE**



Advice to the local planning authority

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

| | |
|-----------------------------------|---|
| To LPA | City of London |
| LPA planning ref no | 24/00648/FULMAJ |
| Our ref | pgo-5560 |
| Site address | 65 Fleet Street London EC4Y 1HT |
| Proposal description | Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 871 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works. |
| Date on fire statement | 28/05/2024 |
| Date consultation received | 17/07/2024 |
| Date response sent | 30/07/2024 |

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

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

Scope of consultation

- 1.1. The above consultation relates to the redevelopment of the existing building at 65 Fleet Street to comprise of a Purpose-Built Student Accommodation (PBSA) led scheme. The building splits into two blocks on ground floor and above.
- 1.2. On levels two and above, the residential levels of the building are split into two blocks (north and south block). The north block continues up to Level 6 and is served by two escape stairs. The larger south block is served by four escape stairs up to Level 7 and three of which continue up to Level 9.
- 1.3. The north block is proposed to consist of 5 upper storeys and the south block will consist of 10 storeys above ground. The top storey of the north block will be 21m above lowest ground floor level.
- 1.4. The north block is served by two escape cores; Core A1 and Core A2. Both cores continue up to the top storey at Level 05 from ground floor.
- 1.5. The south block will be 42.5m above lowest ground level. The upper levels of the building are proposed to consist almost entirely of student accommodation with a total of 871 rooms.
- 1.6. The south block is proposed to be served by four cores:
 - Core B4 from lower ground to Level 07
 - Core B3 from lower ground to Level 9
 - Core B1 from lower ground to Level 11; and
 - Core B2 from Level 0 Level 11.
- 1.7. The ground floor of the south block is proposed to consist of student apartments as well as the main entrance to the PBSA and cultural uses.
- 1.8. The north block will include a new café / bookshop as well as refurbishment and enhancement of the existing Tipperary pub. The pub is proposed to be extended into the neighbouring building to the east.
- 1.9. The Design and Access Statement (dated June 2024 – Executive Summary) states:
“The proposed development seeks to retrofit and refurbish a derelict building to deliver a...mixed-use scheme which improves upon the existing consent while providing a long-term future for a local institution, The Tipperary.”
- 1.10. The basement is proposed to consist of student amenity areas, as well as plant areas, refuse stores and a bike store. Lower ground floor is proposed to consist of a cultural and community space in addition to student accommodation and student amenity spaces. Ground floor is proposed to consist of commercial units including the existing Tipperary pub, in addition to student accommodation and student amenity.

1.11. Residential amenity and ancillary areas will be provided across the building:

- Basement – PBSA Amenity, Cycle Store, Refuse and Plant rooms.
- Lower Ground Floor – PBSA Amenity
- Ground Floor – PBSA Reception
- Level 10 – External terrace garden

1.12. The fire statement dated 28/05/2024 states that the adopted fire safety design standards are BS 9991 and BS 9999. HSE has assessed this application on that basis. It is noted the fire statement was helpfully detailed and informative.

Listed building consent / The Tipperary pub

1.13. For information, page 14 of the Design and Access Statement (DAS) states that Listed building consent is also sought for: *“Improvements to The Tipperary pub...”*

1.14. Paragraph 2.04 of DAS informs that: *“The Tipperary Pub, dates to c.1667 and is Grade II listed. The Tipperary forms part of the north of the Site, adjoining Fleet Street.”*

Consultation

1.15. North Block: The north block will be provided with two escape cores, one of which will be a firefighting core on the basis its footprint will be less than 900m² in area.

1.16. South Block: The larger south block is proposed to be served by four cores up to Level 7, three cores up to Level 9 and two cores up to Level 10. It is proposed that Core B2, B3 and B4 will form firefighting shafts.

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

2. Supplementary information

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

Internal layout of flats

2.1. The fire statement states: *“The studio flats will generally be designed so that occupants do not have to pass within 1.8m of the cooking hob to escape. In apartments where occupants are required to pass within close proximity of cooking areas, Stove Guard devices will be provided in accordance with BS EN 50615.”*

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

Public House

- 2.3. The fire statement states: *“The top storeys of the Tipperary Pub will be served by a single stair, however this forms part of the existing situation which is not being made any worse as a result of the works. The level of safety can be deemed to be enhanced due to the provision of sprinklers.”*
- 2.4. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Basement stairs - CFD (Computational Fluid Dynamics)

- 2.5. The fire statement states: *“Three of the four escape stairs serving the residential levels will continue down to basement level in accordance with code guidance. **This includes both stairs that serve level 10**, due to the need to be provided sufficient means of escape capacity from this level. However, this is considered reasonable on the basis the stairs will be fire separated at ground floor level. It will be demonstrated through CFD at a later stage that the lobby smoke ventilation will be effective in preventing the flow of smoke into the stair for a fire in the basement and will not impact on means of escape for the upper levels.”*
- 2.6. The cited fire safety standard states that where there is more than one common stair from an upper storey or part thereof, at least one such stair serving the upper storeys (or parts thereof) should terminate at ground level. Accordingly, one of the two stairs that serve level 10 should not continue to the basement.
- 2.7. HSE acknowledges the applicant’s commitment that CFD will demonstrate (section 7 of the fire statement), that *‘the smoke extract system will be effective in preventing the flow of smoke into the escape stair...’*.
- 2.8. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Means of escape / Cycle stores

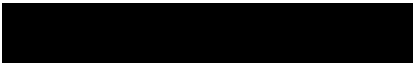
- 2.9. The Design and Access Statement (page 62) states: *“Any potential storage of e-bikes or scooters within the cycle store would need further review and potentially additional safety measures due to the increased risk of these bikes.”*
- 2.10. HSE welcomes the commitment to review and potentially add further safety measures.
- 2.11. Mobility Scooter guidance for residential buildings has been produced by the National Chief Fire Council (NFCC) which will provide guidance on fire safety provision. Further information in relation to e-bikes and e-scooter can be found at [E-bikes and e-scooters fire safety guidance - NFCC](#)
- 2.12. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

Hydrants

2.13. It is not clear if the existing hydrants are currently operational. It is understood that the applicant intends to check these once there is a construction presence. Should there not be an operational hydrant within 90m, an application will be made for a new hydrant.

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

Yours sincerely


Stephen Gallagher
Fire Safety Information Assessor

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

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

- matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application
- matters related to planning applications around major hazard sites, licensed explosive sites and pipelines
- applications for hazardous substances consent
- London Plan policy compliance

Memo



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

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

Date 12 September 2024
Our Ref 24/05334/NPLN
Your Ref 24/00648/FULMAJ

Subject 65 Fleet Street London EC4Y 1HT

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

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

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

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

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

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

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

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

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

The roof terraces on level 10 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 on the following day other than in the case of emergency.

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

No amplified or other music shall be played on the roof terraces.

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

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

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

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

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

All residential premises in the development shall be designed and constructed to attain the following internal noise levels:

Bedrooms- 30dB LAeq,T* and 45dB LAmax

Living rooms- 30dB LAeq, T*

*T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00-23:00.

A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any part of the building.

REASON: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3 and D21.5.

Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the bedrooms does not exceed NR30 and does not exceed NR35 in other habitable rooms attributable to the proposed commercial uses within the

development. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.

REASON: To protect the amenities of residential occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the pub/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 commercial kitchen 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.

- (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 plant is or may be in operation. Noise sensitive premises includes office accommodation.
- (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. Noise levels should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data.
- (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.

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.

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.

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.

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.

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

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

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

Regards



Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob: 

From: [REDACTED]
To: [REDACTED]
Subject: RE: Planning Application Consultation: 24/00648/FULMAJ [SG37810]
Date: 16 September 2024 12:07:17
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37810]

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

2TAM

NATS Safeguarding

[REDACTED]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal

From: [REDACTED]
Sent: Tuesday, September 10, 2024 3:27 PM
To: NATS Safeguarding <[REDACTED]>
Subject: Planning Application Consultation: 24/00648/FULMAJ

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached consultation for 65 Fleet Street London EC4Y 1HT .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Emma Barral
Environment Department
City of London

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From: [REDACTED]
To: [REDACTED]
Subject: Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ
Date: 20 September 2024 14:50:40

THIS IS AN EXTERNAL EMAIL

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ
20 September 2024

Dear Sir/Madam

Re: 65, FLEET STREET, LONDON, EC4Y 1HT

Waste Comments

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

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

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

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers: Groundwater discharges section.

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

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

Water Comments

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

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a

minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ Tel:020 3577 9998 Email: devcon.team@thameswater.co.uk

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Memo

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



From Ms Hazel Austin
Environmental Health Officer
Environment Department

Telephone [REDACTED]

Email [REDACTED]

Date 26 September 2024
Our Ref 24/04209/NPLN
Your Ref PT_EB/24/00648/FULMA J

Subject 65 Fleet Street London EC4Y 1HT

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

This department acknowledges receipt for the above application and have the following comments and observations to make:

Roof Terrace Hours:

The roof terraces on levels 8,9&10, throughout the property, hereby permitted shall not be used or accessed between the hours of 08.00 on one day and 23:00 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.

Roof Terrace Music:

No amplified or other music shall be played on the roof terraces.

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

Fumes from Use Class E / Sui Generis affecting offices or residential:

No cooking shall take place within any Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) unit 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.

Noise from use Class E / Sui Generis affecting offices / non offices:

The proposed Class E / Sui Generis development sharing a party element with office / 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 existing neighbouring premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall 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.

Full Lighting Strategy submission:

Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.

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

Noise control:

(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Ventilation & Extraction Equipment:

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

Hours of servicing:

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

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

Scheme of Protective works:

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

REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

Regards

Hazel Austin
Environmental Health Officer
Pollution Team

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

Mob: 



Historic England

Emma Barral
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00648/FULMAJ
Our Ref: 223995

Contact: Helen Hawkins



02 October 2024

Dear Emma,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023**

65 Fleet Street London EC4Y 1HT

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works

Recommend No Archaeological Requirement

Thank you for your consultation received on 18 September 2024.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The site is located in an area of known archaeology, and previous investigations on the site in the 1920s and 1980s revealed the remains of the medieval Whitefriars priory, as well as Roman and post-medieval remains. The medieval undercroft of the priory, now a listed building, has been preserved within the current development, albeit in a different location to where it was found.

Although some below ground excavations such as lift pits and pump pits are proposed, these will be located within the current basement footprint where archaeological remains have already been removed and are therefore unlikely to have an impact on archaeological remains of significance. The Whitefriars undercroft is to become part of a visitor centre within the site and will therefore be much more accessible to the public. This public benefit is very much welcomed.

Given that no below ground excavations are proposed outside the footprint of the current basements, no archaeological mitigation will be necessary.

No further assessment or conditions are therefore necessary.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Tele phone [REDACTED]

Email [REDACTED]

Date 02/10/24

Our Ref DS/SUDS24/0045

Your Ref PT_EB/24/00648/FULMA J

Subject 65 Fleet Street London EC4Y 1HT

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

The Lead Local Flood Authority has reviewed the relevant information for the proposed non-material amendment. The changes do not appear to impact the drainage system or proposed SUDs features as originally consented and therefore the Lead Local Flood Authority has no objection to the application.

From: Pundsack, Mark
Sent: Wednesday, [October 9, 2024 4:19 PM](#)
To: Barral, Emma; Roy, Gordon
Cc: McCallum, Kieran
Subject: RE: 65 Fleet Street - 24/00648/FULMAJ

Emma,

We will not comment on gateway 1 applications as this is HSEs role as statutory consultee.

Mark

From: Barral, Emma
Sent: Wednesday, [October 9, 2024 4:09 PM](#)
To: Roy, Gordon; Pundsack, Mark
Cc: McCallum, Kieran
Subject: 65 Fleet Street - 24/00648/FULMAJ
Importance: High

Hi Roy/Mark,

I hope you are well.

Really sorry to trouble you and I hope you don't mind me reaching out. I have been passed your details by my colleague Kierian (CC'd) in.

We are working together on the above project at 65 Fleet Street which is for the following –

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

I attach HSE comments, it would be really helpful if you are able to review the

submitted material for us.

Unfortunately, we have very tight timescales due to Committee deadlines.

I attach the submitted Fire Statements for your viewing purposes. I wasn't sure if you would comment as HSE have commented.

Kind Regards

Emma



Emma Kate Barral MRTPI | Planning Officer

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

www.cityoflondon.gov.uk

WINNER | Planning Authority of the Year





70 Cowcross Street
London EC1M 6EJ
Telephone: (+44/0) 207 608 2409
Email: enquiries@thegardenstrust.org
www.thegardenstrust.org

Emailed to Emma Barral
plncomments@cityoflondon.gov.uk
City of London Corporation

10th October 2024

Dear Ms Barral,

Re: 24/00648/FULMAJ | Partial demolition and refurbishment and extension of buildings... | 65 Fleet Street London EC4Y 1HT

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

We are grateful for the opportunity to comment on this application, which has a material impact on the significance of Inner Temple, a historic designed landscape which is Registered by Historic England at Grade II. The inclusion of this site on this statutory register requires great weight to be given to its conservation.

We have assessed the amended documents supplied, particularly the Design and Access Statement Addendum and the amended Heritage and Townscape Visual Impact Assessment (HTVIA), and are disappointed to note that, rather than any reduction in height of the building, the amended proposals simply reduce the extent of the 10th floor and step the 9th floor in a little more. Unfortunately, this does nothing to reduce the impact of the development on the setting of Temple Gardens, as can be seen in the image on p97 of the amended HTVIA, with the roof extension still rising by approx. 4 storeys above the Grade I Listed buildings of King's Bench Walk.

We stand by our previous response to this application (as submitted on 20th August 2024), and ask again that consideration is given to reducing the height of the roof extension by at least two storeys, so that the new development, when viewed from the Inner Temple RPG, appears to rise no higher than the existing buildings (Harmsworth House and 10 Bouverie Street) and the visual intrusion of this modern building into the historic RPG is lessened.

We would be grateful to be advised of your decision, or if further information is submitted.

Yours sincerely,

Dr Tamsin McMillan

Acting Conservation Officer
The Gardens Trust

*For further information, we refer you to the Gardens Trust publication *The Planning System in England and the Protection of Historic Parks and Gardens (2024)*, which is available online at <https://thegardenstrust.org/wp-content/uploads/2024/02/Parks-and-Gardens-in-English-Planning-System-2024.pdf>*

City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

11th October 2024

Dear Sir/Madam,

At its meeting on 19th September 2024 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

24/00648/FULMAJ - 65 Fleet Street

Fleet Street Conservation Area/Castle Baynard Ward. No Ward Club rep.

The Committee received a detailed presentation on this application. Members thanked the representatives of DP9 and their associates for the explanation of their proposals and for answering questions. The Committee then considered the application.

The Committee had no objection to the proposed uses. Members acknowledged that the greater part of the site lay outside the Fleet Street Conservation Area and that there was already a large building south of the Fleet Street frontage. There were no objections to the proposals as far as they affected the detailed treatment of the buildings in the Fleet Street Conservation Area, including the added storeys and the new entrance. As far as the longer views were concerned the Committee expressed reservations about the raised height of the south block in the proposals. Members were concerned about the apparent bulk and horizontal character of the proposal shown in the views from sites on the South Bank, though accepting that the zoom images may have accentuated the harmful effects of the proposals, but were especially concerned by the effects of the proposals in the view from the Temple – View 12 in the applicant's HTVI – which the applicants Heritage, Townscape and Visual Assessment accepts might do some harm. The Committee considered this to have an adverse effect on the Temple Conservation Area.

The Committee also wondered whether the proposed recladding of the existing building in GRC would introduce an unwelcome new material into the City's townscape.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,



Mrs. Julie Fox
Secretary



Ms Emma Barral
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 0207 973 3777

Our ref: **W:** L01580082

6 August 2024

Dear Ms Barral

Arrangements for Handling Heritage Applications Direction 2021

65 FLEET STREET LONDON EC4Y 1HT
Application No. 24/00649/LBC

Thank you for your letter of 17 July 2024 regarding the above application for listed building consent.

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

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

We have drafted the necessary letter of authorisation (attached) for your authority to determine the application as you see fit and referred the case to the National Planning Casework Unit (NPCU). You will be able to issue a formal decision once NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

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

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



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

Telephone 020 7973 3700
HistoricEngland.org.uk

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



Historic England

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

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

Yours sincerely

Claire Brady

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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Historic England

Emma Barral
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00649/LBC
Our Ref: 224001

Contact: Helen Hawkins



02 October 2024

Dear Emma,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023**

65 Fleet Street London EC4Y 1HT

External and Internal alterations to The Tipperary Pub including part demolition of the rear of the pub; erection of 1 storey roof extension containing student accommodation with associated expansion into northern block of 65 Fleet Street at fifth floor level. Works to improve access to Whitefriars Crypt with changes to the surrounding structure of the Crypt to allow for presentation and interpretation of the asset.

Recommend No Archaeological Requirement

Thank you for your consultation received on 18 September 2024.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The site is located in an area of known archaeology, and previous investigations on the site in the 1920s and 1980s revealed the remains of the medieval Whitefriars priory, as well as Roman and post-medieval remains. The medieval undercroft of the priory, now a listed building, has been preserved within the current development, albeit in a different location to where it was found.

Although some below ground excavations such as lift pits and pump pits are proposed, these will be located within the current basement footprint where archaeological remains have already been removed and are therefore unlikely to have an impact on archaeological remains of significance. The Whitefriars undercroft is to become part of a visitor centre within the site and will therefore be much more accessible to the public. This public benefit is very much welcomed.

Given that no below ground excavations are proposed outside the footprint of the current basements, no archaeological mitigation will be necessary.

No further assessment or conditions are therefore necessary.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

Agenda Item 6

| | |
|--|---|
| Committee: | Date: |
| Planning Applications Sub Committee | 10 September 2024 |
| Subject: Ground Floor and Basement Retail Unit 165 Fleet Street London EC4A 2DY Change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis). | Public |
| Ward: Castle Baynard | For Decision |
| Registered No: 24/00236/FULL | Registered on: 5 th March 2024 |
| Conservation Area: Fleet Street | Listed Building: No |

Summary

The proposal seeks planning permission for the change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use (Sui Generis) which would include a noodle bar with cafe and mini golf at ground floor level, and ten pin bowling and ancillary facilities at basement level. No external alterations are proposed as part of this application.

The site, a nine-storey building located on the western end, north side, of Fleet Street between St Dunstan's Court and Johnsons Court, which forms part of the Fleet Street Conservation Area and the Fleet Street Principal Shopping Centre.

The building was refurbished in the early 2000s and provides for office (Class E(g)(i)) use on the upper floors and a retail bank (Class E(c)(i)) at part ground and basement levels. The retail bank premises, which is the subject of this application has been vacant since late 2021.

The building is not listed.

Representations were received from thirty residential and commercial neighbours, including three from Ward Councillors. All object to the proposals. The representations covered the broad themes of (a) impact on residential amenity; (b) anti-social behaviour; (c) public safety; and (d) the impact the character of the Fleet Street Conservation Area. The representations are addressed within the body of the attached report.

In order to address concerns raised in respect of potential impacts on the amenity of Fleet Street and residents in the surrounding courts and alleyways, conditions are attached that would control operational noise and require compliance with an approved Management Statement and dispersal policy which would be subject to review.

The proposal aligns with the changes to the Use Classes Order changes to allow flexibility for businesses to adapt and diversify in order to meet changing demands and supports the primary business function of the City. There would be no loss of active retail frontage, and the application supports the aims of Policy DM20.1: Principal shopping centres, as the use would contribute to the function and character of the PSC, provide facilities for the City's workforce and enhance vibrancy. As such, the proposal is considered acceptable in land use terms.

Extensive, and ongoing, redevelopment works in the area have led to temporarily reduced footfall along Fleet Street. However, when surrounding developments, such as the new Courts building at Salisbury Square and River Court (120 Fleet Street) are completed, contributing to the creation of a new "Fleet Street Quarter", there will be increased local demand for retail and leisure facilities, such as that proposed, to service the increased level of activity in the area.

Fleet Street is a busy main thoroughfare and forms one of the City's five Principal Shopping Centres. It is the established processional route which runs from the boundary with the City of Westminster eastwards to Ludgate Hill, St. Paul's Cathedral and beyond to the Royal Exchange. Although the newspaper industry, which dominated the area from the mid-nineteenth century through to the late twentieth century, has largely been replaced by other commercial activities, such as, banking, insurance and legal services, the perceived character of Fleet Street remains as a busy commercial centre with retail and leisure facilities providing for workers and residents.

Commensurate with the PSC location, there are many retail outlets in the immediate vicinity including eight drinking establishments within 300m of the proposal site, three (The Editors Tap, The Tipperary and Ye Olde Cheshire Cheese) within 100m. It is considered that the proposed mixed-use, comprising food and beverage uses with indoor activities, would not be out of character in this location.

Recommendation

(1) That Planning Permission be granted for the above proposal in accordance with the details set out in the attached schedule.

Site Location Plan



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ADDRESS:
165 Fleet Street

CASE No.
24/00236/FULL

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



CITY OF LONDON

ENVIRONMENT DEPARTMENT

APPLICATION COVER SHEET

165 Fleet Street London EC4A 2DY

| TOPIC | INFORMATION | | | |
|--------------------------------|------------------------------|------------|----------------------------|------------|
| 1. HEIGHT | EXISTING | | PROPOSED | |
| | N/A | | | |
| 2. FLOORSPACE GIA (SQM) | USES | EXISTING | PROPOSED | |
| | Class E(c)(i) Retail Bank | 1643.54sqm | Sui Generis (mixed-use) | 1643.54sqm |
| | | | | |
| | | | | |
| | TOTAL | 1643.54sqm | TOTAL | 1643.54sqm |
| | | | TOTAL UPLIFT: | 0 sqm |
| | | | | |
| 3. OFFICE PROVISION IN THE CAZ | Existing: | | | |
| | Proposed: | | | |
| | Office uplift: | | | |
| 4. EMPLOYMENT NUMBERS | EXISTING | | PROPOSED | |
| | 0 | | 20 Full-time | |
| 5. VEHICLE/CYCLE PARKING | EXISTING | | PROPOSED | |
| | N/A | | N/A | |
| | | | | |
| | | | | |
| | | | | |
| 6. HIGHWAY LOSS / GAIN | N/A | | | |

| | | |
|--|---|----------|
| | | |
| 7. PUBLIC REALM | N/A | |
| 8. STREET TREES | EXISTING | PROPOSED |
| | N/A | |
| 9. SERVICING VEHICLE TRIPS | EXISTING | PROPOSED |
| | N/A | |
| 10. SERVICING HOURS | <p>No servicing between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays.</p> <p>The servicing arrangements are in accordance with the original planning permission for this site.</p> | |
| 11. VOLUME OF RETAINED FABRIC | 100% | |
| 12. REGULATED Operational CARBON SAVINGS | N/A | |
| 13. OPERATIONAL CARBON EMISSION | N/A | |
| 14. EMBODIED CARBON EMISSIONS | N/A | |

| | |
|--|-----|
| 15. WHOLE LIFE CYCLE CARBON EMISSIONS | N/A |
| 16. WHOLE LIFE-CYCLE CARBON OPTIONS | |
| 17. TARGET BREEAM RATING | N/A |

Main Report

Site

1. 165 Fleet Street is a nine-storey building located on the western end, north side, of Fleet Street between St Dunstan's Court and Johnsons Court.
2. The site lies within the Fleet Street Conservation Area and the Fleet Street Principal Shopping Centre.
3. The building was refurbished in the early 2000s and provides for office (Class E(g)(i)) use on the upper floors and a retail bank (Class E(c)(i)) at part ground and basement levels.
4. The building is not listed.

Relevant Planning History

5. Conditional planning permission (application no. 0485BF) was granted on 16 October 2002 for the "Refurbishment and alteration of [the] existing building including extensions to upper floors to provide 8,239 square metres of offices (B1) and 2,674 square metres shop (A1)".
6. Conditional planning permission (application no. 07/00284/FULL) was granted on 17 July 2007 for the "Use of basement and ground floors as bank, professional and financial use (Class A2) (1766 sq.m.), in lieu of approved Class A1 use, including alterations to the shopfront and installation of three ATM's".
7. At the time planning permission 07/00284/FULL was granted, retail banking/financial services fell within Class A2 of the Town & Country Planning (Use Classes) Order 1987.
8. Revisions to the above Order, which came into force in September 2020, amalgamated Classes A1, A2, A3 and B1 into a new Class E (Commercial, Business and Service) use.

Licensing

9. Following a formal hearing, a premises licence was granted by the Licensing Sub-Committee on 16 April 2024. The licence allows for licensable activities between 10:00 and 00:00 Monday to Wednesday, 10:00 and 01:00 Thursday to Saturday, and 10:00 to 23:00 on Sundays. Opening hours are extended by a further 30mins each day. Conditions have been attached to mitigate potential public nuisance and the operator has agreed to provide CCTV coverage, a Challenge 25 policy, incident recording, and controlled entry and dispersal policies to ensure safety and minimise disturbance.

Proposals

10. Planning permission is now sought for the change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use (Sui Generis) which would include a noodle bar with cafe and mini golf at ground floor level, and ten pin bowling and ancillary facilities at basement level.

11. No external alterations are proposed as part of this application.

Consultations:

12. The planning application was advertised on site and in the press. Neighbouring residential occupiers located in the immediate vicinity at Bolt Court, 53A, 54A and 62A Fleet Street, Pleydell House, Red Lion Court, Crane Court and Pemberton Row were consulted on an individual basis.

13. Thirty-one representations, including three from Ward Councillors and a supplementary submission from residents at Bolt Court, have been received. All object to the proposals.

Copies of the representations are attached in full to this report.

14. The representations covered the broad themes of (a) impact on residential amenity; (b) anti-social behaviour; (c) public safety; and (d) the negative impact on the character of the Fleet Street Conservation Area.

15. The table below summarises the public representations received:

| Principal Themes | Nature of representations (Sample) | Number of comments on this theme | Response |
|-------------------------------|--|---|---|
| Impact on residential amenity | 1. ...the proposed facility will have a significantly detrimental effect on local residents on account of noise, pedestrian traffic and antisocial behaviour where consumption of alcohol is involved. 165 Fleet Street is accessible via an alleyway that directly passes the entrance to 6 Bolt Court's and will be an inevitable thoroughfare for the many potential revellers coming and going from the proposed premises. Bolt Court is a peaceful sanctuary enjoyed by residents and this proposed | 26 | A Management Statement has been submitted that seeks to address the concerns of residents and local businesses. |

| | | | |
|-----------------------|---|----|--|
| | <p>premises will certainly disrupt that peace.</p> <p>2. The narrow alley ways would become a thoroughfare and a place to loiter, for the venue's customers which would make it unbearable for the residents of Bolt Court given the layout of the courtyard. Such a venue should not be located near residential buildings.</p> | | |
| Anti-social behaviour | <p>Many guests from the proposed change of use will have drunk alcohol and a proportion will be drunk, unacceptably impacting the amenity of residents and the environmental amenity in St Dunstan's Court, Bolt Court and in other nearby streets. This is from the likely anti-social behaviour, public nuisance and/or crimes of: (a) Public urination and vomiting; (b) Littering of cigarette butts, disposable vapes, and drinks containers; (c) In some cases, abusive/threatening language to residents/office workers; (d) In the worse cases, fights/violent disorder from drunk or high patrons.</p> | 20 | <p>It is considered that the proposed Management Statement and dispersal strategy, along with the gradual dispersal of smaller groups would help mitigate any anti-social behaviour.</p> |

| | | | |
|---------------|--|---|--|
| | <p>2. ... increased anti-social behaviour and crime that will seep into the small alleys off of Fleet Street should this new property continue with their plans. These alleys are not designed to be high traffic areas, and by allowing this mixed-use space to open, the increased foot traffic will inevitably lead to more discarded rubbish, dangerous debris such as broken glass, and the increased potential for criminal and unhoused populations to take root</p> | | |
| Public Safety | <p>1. I work late into the evening and am concerned that the environment will become unsafe if a business serving alcohol for 16 hours a day, for consumption on and off the premises, is opened at 165 Fleet Street... the courts off Fleet Street, through which I walk, are, by their historic nature, quiet and labyrinthine and as such lend themselves to various other criminal activities that can be associated with night time venues such as dealing and consumption of illegal substance. There will</p> | 2 | <p>While the premises would be open to the public throughout the day, it would not operate as a public house. Patrons would have pre-booked time slots during which they would take part in the activities (mini-golf and/or ten pin bowling) eat and drink. Dispersal would be in small groups with the number of</p> |

| | | | |
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| | <p>undoubtedly be the potential for an increase in other crimes.</p> <p>2. I have not previously worried about inevitable late-night working and commuting for male and female employees and residents, young or mature, and my own Family. I will if this Application is granted.</p> | | <p>departures increasing towards the terminal hour but managed to ensure a more gradual dispersal and help mitigate any anti-social behaviour.</p> |
| <p>Impact on character of the Fleet Street Conservation Area</p> | <p>1. contrary to DM12.2 of Local Plan as it doesn't not preserve or enhance the character or appearance of the conservation area. Fleet Street is in a conservation and is the main processional route to St Paul's Cathedral. Conservation areas are defined as designated heritage assets and so this development proposal does not sustain or enhance the setting or its significance. Having a leisure venue that will have a footfall of over 1,500 people a day, selling alcohol inside and outside those premises until 2am, is not in keeping of an area that its rich in history and listed buildings. Its use does not sit at all well within the existing</p> | <p>14</p> | <p>Forming one of the City's designated Principal Shopping Centres, the perceived character of Fleet Street (rather than it's built form) is that of a busy commercial area with commensurate retail and leisure provision.</p> |

| | | | |
|-------|---|---|--|
| | <p>street patterns; the setting; nor the frontage it proposes on Fleet Street.</p> <p>2. Notable features of the Fleet Street Conversation Area include legal history, ceremonial grandeur, Dickensian alleyways and courtyards, a Grade 1 listed church, the famous newspaper connection, historic pubs and Dr Johnson's House. The proposed change of use to a late-night bowling alley and mini golf leisure facility (which apparently could see 1,000 to 2,000 visitors per day/night), does not accord with the character of the Fleet Street Conversation Area</p> | | |
| Other | <p>1. Other leisure facilities in the area include historic pubs and wine bars and The Dr Johnson museum. These traditional venues situated in an historic area will suffer damage from a brash venue open 16 hours a day with an active frontage in such close proximity.</p> <p>2. The anticipated increase in footfall around Fleet Street may overwhelm the</p> | 2 | <p>Competition between businesses is not a planning consideration.</p> <p>Fleet Street is one of the City's five Principal Shopping Centres (PSCs)</p> |

| | | | |
|--|---|--|--|
| | <p>existing infrastructure and disrupt the established character of the financial quarter. This could have adverse effects on the local businesses, including pubs and eateries, by diverting customers and attracting the wrong crowds, particularly after 11pm.</p> | | |
|--|---|--|--|

16. Several respondents referenced their agreement with comments of Alderwoman Martha Grekos.

The Alderwoman’s comments are laid out in full below:

Objection

As Alderwoman of Castle Baynard Ward. I am writing to submit the below representation on behalf of some of the residents in the ward (especially for those living at 6 Bolt Court which is directly behind 165 Fleet Street) for the planning application to covert the ground floor and part basement into leisure facilities (namely a mini golf, ten pin bowling) noodle bar and cafe and ancillary facilities.

Myself and the residents, as well as many others including the **Planning Department* of the City of London, have objected on strong terms with regards to the licensing application. Those comments still stand not just for the licensing application but also this planning application.

We all want to welcome with open arms new businesses into this area but their planning applications need to be accordance with the City of London’s Adopted Local Plan. I have read the application, but apart from the applicant’s statement that their application will not impact on or reduce the existing office provision in accordance with policies CS1 (Offices) and DM1.1 (Protection of office accommodation) and that it will not have an impact on the setting of the Fleet Street Conservation Area as there are no proposed external changes, thus being in accordance with policy DM12 (Development in Conservation Areas) and the London Plan and the National Planning Policy Framework policies, there is no mention or consideration of Policy DM 3.5 (Nighttime entertainment) or indeed any such considerations for a day-time entertainment,

Local Plan Policy DM 3.5

Policy DM 3.5 states that:

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:

(i) the amenity of residents and other noise-sensitive uses;

(ii) 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.

The applicant has failed to provide a Management Statement to detail how these issues will be met. As such, I am objecting to this application as I am not satisfied that the amenity of the residents and other noise-sensitive uses have been considered nor am I satisfied that the environmental amenity has also been taken into account. I give my further reasons below.

Reasons

The applicant has not provided any operating hours of the restaurant or the cafe or the bowling alley/mini golf nor taken into account views from residents and local businesses in designing their premises for night-time entertainment uses and planning the operation of the proposed use to minimise adverse impact on amenity. The only facts as to its operation are in its licensing application - which is separate to this planning application - which states that they will be providing a themed mini golf course bar to show films, play live music and serve alcohol from 10am to 2am every day (and specifically the licence application states to provide late night refreshments inside and outside these premises from 11pm till 2am each day and to sell alcohol onsite and offsite every day from 10am to 2am every day - with premises open to the public till 2.30am).

This is an unacceptable impact on residential amenity, contrary to Policy DM 3.5. Behind 165 Fleet Street, there is a large residential community found on Johnson's Court and Bolt Court. There are also flats at 171 Fleet Street and blocks of flats in Red Lion Court and Crane Court. None have been consulted about this planning application nor the licensing application. In addition, we are welcoming, hopefully shortly if granted consent, a large student accommodation block of 750 residential units opposite 165 Fleet Street (namely 65 Fleet Street, next to the Tipperary). The noise, in the early hours (11pm to 2am) will mean large disturbance to residents' sleep given the premises will be open until 2am and customers will be arriving and leaving the premises then. No other premises on Fleet Street is open beyond 11pm in order to fit in with the local context and to respect the residents' amenity as well as the business community.

The sale of alcohol, inside and outside (but especially outside as there is no outdoor sitting area being provided with this planning application) will mean that there will be an acceptable impact on the environmental amenity, which is contrary to Policy DM 3.5. Given the consumption of alcohol off premises till 2am, potentially there will be an increase in anti-social behaviour at those hours if a license is given to provide alcohol onsite and offsite. No other premises in that area is open until 2am and sells alcohol offsite at those hours. Despite the proposed efforts of the applicant to have a sign to leave quietly and also CCTV footage, this will not abate such nuisance and crime. Such licenced premises will just exacerbate the situation and put the community at risk of increased crime/disorder and public nuisance. Our alleyways and courtyards just off Fleet Street is where such anti-social behaviour will congregate, impacting residents, given that is where the majority of the residential blocks are situated. In addition, there will be more rubbish in those alleyways and courtyards and on the main street and nothing has been suggested as to how to abate all of this. I am already contacted most mornings by local businesses with concerns over the rubbish they find on the streets as they come into work. The new premises license will just fuel the issues we are already trying to control in the area.

Paragraph 3.3.22 of the Local Plan states that: "Planning applications for new and extended nighttime entertainment uses or for variations of planning conditions must be accompanied by a Management Statement that addresses planning amenity issues, sets out how potential impacts on amenity will be addressed through the design of the premises and how they will operate without causing disturbance including: hours of closure to protect amenity; noise mitigation plans related to both internal and external noise, including measures to reduce sound transfer, such as sound-proofing, noise controls and double entry lobbies; arrangements for the storage, handling and disposal of waste; a timed programme for deliveries and collections and other servicing arrangements; measures to deal with the emission of odours; and location of ventilation ducts and plant."

Paragraph 3.3.23 of the Local Plan also states that "Assessment of the Management Statement will have regard to the City Noise Strategy, the provisions of the City of London Statement of Licensing Policy and to any submitted licence application operating schedule."

No such detail has been provided.

Lastly, the applicant has failed to demonstrate where the mini-golf or cafe will be on the ground/basement plan. On the submitted ground plan, I can see solely the restaurant proposals. On the submitted basement plan, I can see solely the bowling alley proposals.

Conclusion

As such, given the lack of detail and consideration of Local Plan Policy DM3.5 as well as lack of consultation by the applicant with myself as Leader of Castle Baynard Ward, my fellow ward Councillors as well as

residents and businesses in this area, I urge you to decline this application.

[*Note - As a Responsible Authority, the Planning Division raised concerns in respect of the Premises Licence application but noted that any issues “*might be addressed by the imposition of suitable conditions limiting the terminal hour of the licensable activities, particularly the sale of alcohol for consumption on and off the premises, and (if applicable under the licencing regime) requiring a customer management plan.*”

The Licensing Sub-Committee, as part of their considerations, limited the hours of licensable activities, off-sales were removed from the application and a number of conditions relating to noise, odour and fumes were appended to the licence, addressing the concerns raised.]

17. Objections were also received from Ward Members Henrika Priest CC and Catherine McGuinness CBE CC. These are attached in full to this report.
18. The waste storage and collection facilities indicated in the Design and Access Statement, April 2024, comply with the requirements of the Cleansing Division.
19. Information provided in respect of proposed passive and active safety measures, construction products and materials is sufficient to meet London Plan policies D5 and D12.
20. Environmental Health have raised no objection to the proposed use and proposed operational hours, subject to conditions being imposed to ensure the amenity of the surrounding area is protected. These are included in the attached schedule.

Policy Context

21. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
22. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation in Spring 2024. It is anticipated that the City Plan will be submitted to the Secretary of State in Summer 2024. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
23. Government Guidance is contained in the National Planning Policy Framework (NPPF) September 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.
24. 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.”

25. Chapter 7 of the NPPF seeks to ensure the vitality of town centres.
26. Paragraph 90 states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:
 - a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;
 - b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
 - f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.
27. Chapter 8 of the NPPF seeks to promote healthy and safe communities.
28. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:
 - a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
 - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
 - c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
29. Paragraph 97 states:

“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

 - a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of

- worship) and other local services to enhance the sustainability of communities and residential environments;
- b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
 - c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
 - d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
 - e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Considerations

30. 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).
31. The principal issues in considering this application are:
- The extent to which the proposals comply with Government policy advice (NPPF).
 - The extent to which the proposals comply with the relevant policies of the Development Plan.
 - The impact of the proposals on residential amenity.

Land Use

32. Adopted Local Plan (2015) Policy CS20 states that existing retail facilities should be protected unless it is demonstrated that they are no longer required and to resist the loss of retail frontage and floorspace. Paragraph 3.20.6 of the Local Plan sets out that retailing comprises several uses, including restaurants and cafes (Class A3) and drinking establishments (Class A4). By virtue of changes to the Town and Country Planning (Use Classes) Order 1987 introduced by the Business and Planning Act 2020, these use classes have been amalgamated and reclassified within the newly established Class E, which covers a broad range of uses including retail, restaurants and cafes, offices, and other uses. Drinking establishments were reclassified as a sui generis use.

33. The Local Plan was adopted prior to these changes, but it remains the basis for decision-making in the City, subject to other material considerations. In that regard, when considered against adopted policy, it is officers view that the proposed mixed-use which would include a food and beverage offer, as well as indoor activities, would not result in a significant loss of a retail type uses in this location.
34. Although only of limited weight, emerging Local Plan Strategic Policy S22: Fleet Street and Ludgate, seeks to enhance the cultural offer and provide complementary uses to the judicial and retail functions.
35. Paragraph 14.7.7 adds “The PSC is an important aspect of Fleet Street that provides vibrancy along its length; however, the PSC is under-performing and has the potential to diversify. To strengthen the PSC, it should continue to provide comparison and convenience shopping, but also look to extend its retail offer into the evenings and weekends and provide a broader range of retail and leisure uses and extend activity into the evening and weekends in this key area of change.
36. The emerging Local Plan also encourages the provision of active frontages across the City provided they do not impact adversely on the amenity of residents, workers, and visitors.
37. In recent years the Fleet Street PSC has seen an increase in retail vacancy due to reduced footfall associated with extensive redevelopment in the area. The City of London Retail Survey indicates that there are 19 vacant units from the boundary with Westminster to the west side of Ludgate Circus.
38. The unit at 165 Fleet Street, previously occupied by HSBC, has been vacant since late 2021.
39. This application proposes a mixed-use unit, comprising food and beverage uses with indoor activities which aligns with the Use Classes Order changes to allow flexibility for businesses to adapt and diversify in order to meet changing demands and supports the primary business function of the City. There would be no loss of active retail frontage and the application supports the aims of Policy DM20.1: Principal shopping centres, as the use would contribute to the function and character of the PSC and provide facilities for the City’s workforce and enhance vibrancy. As such the proposal is considered acceptable in land use terms.

Impact on Residential Amenity and the Character of the Fleet Street Conservation Area

40. Local Plan Policy DM3.5 (Night-time entertainment) and Draft Local Plan Policy CV4 (Evening and Night-Time Economy) sets out that any proposals for new night-time entertainment and related uses will only be permitted where there is no unacceptable impact on the amenity of residents or on environmental amenity, taking into account the potential for noise, disturbance and odours from the operation of the premises, customers arriving and leaving the premises and the servicing of the premises.

41. London Plan Policy D13 sets out the Agent of Change Principle, under which new noise and other nuisance generating development proposed close to residential should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.
42. Current Policy DM3.5, draft Policy CV5 (Evening and Night-Time Economy) and draft Policy SA2 (Dispersal Routes) states that applications for night-time entertainment and related uses should include a Management Statement setting out how any impacts on residential amenity and environmental amenity will be addressed and setting out proposals for the dispersal of patrons.
43. A 'Management Statement' has been submitted as an appendix to the Design and Access Statement. This outlines the management measures to be taken to avoid disturbance caused by users of the premises to the area generally.
44. It is recommended that a condition be imposed requiring the operation of the premises in accordance with the approved 'Management Statement' that allows for a review of the statement as and when required.
45. Environmental Health Officers have recommended conditions relating to the control of noise and odour nuisance from mechanical plant, disturbance caused by music and hours of servicing.
46. Fleet Street, one of the City's five Principal Shopping Centres, forms the established processional route, including for the Lord Mayor's Show, which runs from the boundary with the City of Westminster eastwards to Ludgate Hill, St. Paul's Cathedral and beyond to the Royal Exchange. It is a busy main thoroughfare that was dominated by the newspaper industry from the mid-nineteenth century through to the late twentieth century; along with a thriving pub trade. Writing in 1879, Charles Dickens junior remarked: 'A tavern-street, as well as a literary centre, Fleet Street was and is' (Fleet Street CA Character Summary and Management Strategy Feb 2016).
47. Although the newspaper industry has largely been replaced by other commercial activities, such as, banking, insurance and legal services, the perceived character of Fleet Street remains as a busy commercial centre with retail and leisure facilities providing for workers and residents. The proposed use does not detract from that established character.
48. It is acknowledged that the extensive, and ongoing, redevelopment works in the area have led to temporarily reduced footfall along Fleet Street. However, when surrounding developments, such as the new Courts building at Salisbury Square and River Court (120 Fleet Street) are completed, all contributing to the creation of a new "Fleet Street Quarter", there will be increased local demand for retail and leisure facilities, such as that proposed, to service the increased level of activity in the area.

49. Commensurate with the PSC location, there are many retail outlets in the immediate vicinity including eight drinking establishments within 300m of the proposal site, three (The Editors Tap, The Tipperary and Ye Olde Cheshire Cheese) within 100m. It is considered that the proposed mixed-use, comprising food and beverage uses with indoor activities, would not be out of character in this location.
50. There are a large number of residential occupiers in the immediate vicinity of the proposal site. They are principally located on the north side of Fleet Street within the neighbouring courts and alleyways, and to the south on Fleet Street.
51. The applicant advises that the nature of the business is not that of a drinking establishment. Patrons would have pre-booked time slots during which they would take part in the activities (mini-golf and/or ten pin bowling) eat and drink. Therefore, arrival and dispersal would be at generally gradual pace. It is acknowledged that this would increase towards the terminal hour, but this would be managed to ensure a gradual dispersal.
52. The business model aims for corporate business during the week with families and groups on the weekend. Some "walk-ins" would be allowed if slots were available.
53. The venue's proposed operating hours are 10:00 - 00:30 Monday to Wednesday, 10:00 - 01:30 Thursday to Saturday and 10:00 - 23:30 on Sunday. This aligns with the opening hours granted by the Licensing Sub-Committee. A planning condition is recommended to ensure that the premises is not open to customers between the terminal hour on one day and 10:00am the next day.
54. The submitted Management Statement advises that during operating hours:
- Customers will not be permitted to use, stand, or consume food or alcoholic drinks purchased within the premises on either St. Dunstan's Court or Johnson's Court at any time.
 - No staff will be permitted to use the side doors or courtyard space for breaks.
 - A weekly risk assessment will be carried out by management, and for expected busy periods like the Christmas season, security will be employed to both monitor the site's entrance but also the side lanes of St Dunstan and Johnson Court.
 - The daily management checklist will include a sweep of these outside areas at closure as an extra preventive measure.
 - All residents to be sent contact details for management of premises.
55. It should be noted that, contrary to points raised in the attached objections, no off-sales of alcohol are permitted under the current premises licence.
56. Officers consider that the measures proposed in the Management Statement, together with the imposition of appropriate and relevant

conditions, would mitigate the concerns expressed by residential and commercial neighbours in relation to any potential impact on local and residential amenity.

57. The applicant has reviewed and agreed the proposed planning conditions and the implementation of an on-going review of the Management Plan. This corresponds with similar requirements imposed through the Licencing regime (see paragraph 9 above).

Anti-social Behaviour and Public Safety

58. There are many licensed premises within the local area, including those just to the west within the City of Westminster's jurisdiction, which operate late hours. It is considered that the proposed Management Statement (including the dispersal strategy contained therein) along with the gradual dispersal of smaller groups would help mitigate any anti-social behaviour.
59. It is noted that objectors have referenced a single incident that took place at a similar venue in the City of Westminster. Such reference is not pertinent to the consideration of this application.

Access

60. The premises has a large sliding door with level access from the street and an internal ramp bringing customers into the main ground floor area where an existing stairwell and lift connects to the basement.
61. There are no changes to the access arrangements proposed as part of this application.

Servicing

62. Due to the location and layout of the building it is necessary for all deliveries to be made via the main door on Fleet Street, and the side service door on St Dunstan's Court.
63. Deliveries will be restricted to between 8am and 1pm in line with the loading restrictions currently in place on Fleet Street.

Waste

64. The waste storage and collection facilities indicated in the Design and Access Statement, April 2024, meet the requirements of the Cleansing Division and accord with Policy DM17.1.

Transport

65. With eight bus routes and nearby underground and overground stations, the site has a Public Transport Accessibility Level (PTAL) rating of 6B.
66. With an average capacity of 250 persons at anyone time, the premises are unlikely to have a detrimental impact on the local transport network.

Cycle Parking

67. The site does not benefit from any external space and, therefore, there is no opportunity to provide for external customer cycle parking.

68. Due to the high level of accessibility via public transport, it is not proposed to provide any onsite cycle parking for staff.

Public Sector Equalities Duty

69. When considering proposed development, the Public Sector Equality Duty requires the City of London Corporation to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.

70. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

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

72. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

73. It is the view of officers that a decision to grant permission, subject to appropriate conditions, would not disadvantage those who are protected under the Equality Act 2010.

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

Human Rights Act 1998

75. 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")).

76. It is the view of officers that there would be no infringement of the ECHR.

Conclusions

77. 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 including SPDs and SPGs, the NPPF, the emerging Local Plan and considering all other material considerations.
78. The proposed change of use of the premises to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis) use is considered acceptable. There would be no loss of active retail frontage, and the application supports the aims of Policy DM20.1: Principal shopping centres, as the use would contribute to the function and character of the PSC providing local facilities for the City's workforce, enhance vibrancy, and retain an active frontage.
79. In order to address concerns raised in respect of potential impacts on the amenity of Fleet Street and residents in the surrounding courts and alleyways, conditions are attached that would control operational noise and require compliance with an approved Management Statement and dispersal policy which would be subject to review.
80. Having assessed the impact of the proposal and recognising the weight to be given to any potential harm, it is considered that the proposals would achieve a use for the premises which would contribute positively to the vibrancy and activity of the Fleet Street Conservation Area and the area in general.
81. Approval of the proposed mixed (Sui Generis) use, which would include a noodle bar with café, mini golf, ten pin bowling and ancillary facilities, is recommended.

Background Papers

Comment 15.03.2024 Dr Rosemarie Hutchinson

Comment 16.03.2024 Mr Arvind Shah

Comment 18.03.2024 Mr Andrew Gavan

Comment 18.03.2024 Alderwoman Martha Grekos CC

Comment 20.03.2024 Mr Michael Harris and Prof. Emerita Rebecca Bailey Harris

Comment 26.03.2024 Ms Martha Grekos

Comment 27.03.2024 Ms Katherine Lau

Comment 27.03.2024 Dr Kirsty Mann

Comment 27.03.2024 Efstathios Kapelis

Comment 27.03.2024 Mr David Canty

Comment 27.03.2024 Mr Yikai Zhang

Comment 27.03.2024 Dr Mark Yates

Comment 28.03.2024 Miss Kristy Fok

Comment 28.03.2024 Mr Christopher Field

Comment 28.03.2024 Mr Michael Radford

Comment 28.03.2024 Dr Charlotte Spencer

Comment 29.03.2024 Mr Allan O'Neill

Comment 29.03.2024 Noel Chun

Comment 29.03.2024 Mrs Margaret Mann

Comment 29.03.2024 Mr Julian Cooper

Comment 31.03.2024 Henrika Priest CC

Comment 01.04.2024 Toby Brown

Comment 01.04.2024 Mr John Griffiths

Comment 01.04.2024 Mr Joseph Sullivan

Comment 01.04.2024 Miss Catherine McGuinness CC

Comment 01.04.2024 Mr Darren Shapland

Comment 02.05.2024 Miss Vasiliki Manta

Comment 03.05.2024 Ms Amanda Singleton

Comment 06.05.2024 Mr Jeremy Simons

Comment 24.05.2024 Mrs Alice Gambato

Comment 14.10.2024 Prof. Emerita Rebecca Bailey and Toby Brown

Appendix A

Relevant London Plan Policies

Policy GG1 (Building strong and inclusive communities) encourages early and inclusive engagement with stakeholders, including local communities, in the development of proposals, seeking to ensure positive changes to the physical environment and provide access to good quality community spaces, services, amenities and infrastructure. In addition, it supports London continuing to generate a wide range of economic and other opportunities promoting fairness, inclusivity and equality.

Policy D14 (Noise) seeks to avoid significant adverse noise impacts on health and quality of life and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development.

Policy S1 (Developing London's social infrastructure) states that development proposals should provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies. New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.

Relevant GLA Supplementary Planning Guidance (SPGs)

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- Cultural Strategy (2018);
- Central Activities Zone (March 2016).

Relevant Draft City Plan 2036 Policies

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL3 Noise and light pollution

S2 Safe and Secure City

SA1 Crowded Places
S6 Culture, Visitors and the Night -time Economy
CV2 Provision of Visitor Facilities
DE9 Lighting
S9 Vehicular transport and servicing
S10 Active travel and healthy streets
AT1 Pedestrian movement
AT2 Active travel including cycling
AT3 Cycle parking
S11 Historic environment
CE1 Zero Waste City

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

City Public Realm (2016);
Cultural Strategy 2018 – 2022 (2018).

Relevant Local Plan Policies

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.

DM10.8 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.

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.

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.

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.

CS20 Improve retail facilities

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

DM20.1 Principal shopping centres

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:
 - a) maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
 - b) the contribution the unit makes to the function and character of the PSC;
 - c) the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.
2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking

establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

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: **24/00236/FULL**

Ground Floor and Basement Retail Unit 165 Fleet Street London

Change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis).

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 Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).
REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.
- 3 The use hereby approved shall be operated in accordance with the Management Statement attached to document "165 Fleet Street Design and Access Statement April 2024" prepared by Beasley Dickson Architects and received on 10 May 2024. The Management Statement shall be reviewed at the end of Year 1, following the grant of planning permission and, thereafter, as may be required from time to time by the Local Planning Authority. The premises must be operated in accordance with the approved Management Statement for the life of the use.

REASON: To safeguard the amenity of the adjoining public square and the area generally in accordance with the following policies of the Local Plan: DM3.5, DM15.7, DM19.4, DM21.3.

- 4 The Sui Generis use hereby permitted shall not be open to customers between the hours of 00:30hrs on one day and 10:00hrs the next day Tuesday to Thursday; 01:30hrs on one day and 10:00hrs the next day Friday to Sunday; and between 23:30hrs on one day and 10:00hrs the next day Sunday to Monday.

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.

- 5 Unless otherwise approved by the Local Planning Authority the doors on the St. Dunstan's Court elevation shall be kept closed and only used 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.

- 6 No live or recorded music shall be played that can be heard outside the premises.

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

- 7 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

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

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

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

- 9 The proposed Sui Generis use, hereby approved, sharing a party element with 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 existing neighbouring premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall 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.

- 10 No cooking shall take place within the Sui Generis unit 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.
- 11 Before any new 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.
- 12 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 13 All parts of the existing and any future 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 any adjoining premises and public amenity in accordance with the following policies of the Local Plan: DM 15.7 and DM 21.3

- 14 The existing refuse storage facilities within the building shall be used by the operators of the use hereby approved, and no waste shall be placed on the public highway.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

- 15 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:

Drawing nos. 4-C-43130 -01, 4-C-43133 -01; Unnumbered - External Area Extent; Site Location Plan (EGL542149).

Documents: The Aldgate Tap: External Management Plan rec'd 19.11.2023

REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

- 2 Planning permission is hereby granted only for the change of use. Any works that would materially affect the external appearance of the building or, in the case of a listed building, its special architectural and historic interest, will require a separate application for planning permission and/or listed building consent.

- 3 Access for disabled people is a material consideration in the determination of planning applications. The City of London's Access Advisor has assessed the planning application to ensure that the proposal meets the highest standards of accessibility and inclusive design required by London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and Draft City Plan 2036 Policy HL1. The Access Advisor promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

- 4 The Environment Department (Planning Division) should be consulted on:

(a) The display of any advertisement material on the premises. Advertisements may be subject to the City of London Corporation's Byelaws.

- 5 Ventilation for any kitchens will need to be provided to roof level. Planning permission will be required for any ducts, vents or plant that would materially affect the external appearance of the building. It cannot be assumed that ductwork will be permitted on the exterior of the building.
- 6 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.

Comments for Planning Application 24/00236/FULL

Application Summary

Application Number: 24/00236/FULL

Address: Ground Floor Retail Unit 165 Fleet Street London EC4A 2DY

Proposal: Change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis).

Case Officer: Liam Hart

Customer Details

Name: Dr rosemarie Hutchinson

Address: Flat4 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: The application does not fit within the objectives of the Local Plan:

- "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"

Specifically by:

- Preserving and enhancing the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them.

- Safeguarding the character and setting of the City's gardens of special historic interest

Furthermore the local plan states:

- "Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

This leisure venue will undoubtedly change the character of the area:

- Particularly if the sale of food and alcohol for off site consumption continues into the early hours of the morning. There is potential for disorderly behaviour, nuisance, littering and crime. It will be detrimental to the quiet and intimate character of Bolt Court and Gough Square due to their

proximity to the venue and the seating facilities provided for community use.

- The applicants have explicitly stated that it is their intention that the proposed venue will have an impact on the character of the area:

"This use will maintain an active frontage along Fleet Street positively enhancing the street scene and contributing to an enlivened wider neighbourhood"

- The reality of the character of the area is at odds with the description given (in the Design and Access Statement) where the character of the area is described as "principal shopping centre "

- The leisure venue proposed is not sympathetic to the area. Other leisure facilities in the area include historic pubs and wine bars and The Dr Johnson museum. These traditional venues situated in an historic area will suffer damage from a brash venue open 16 hours a day with an active frontage in such close proximity.

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Case Officer: Liam Hart

Customer Details

Name: Mr Arvind Shah

Address: 167 Fleet Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: Dear Sir

I understand there is a licensing application and planning application both which are receiving consideration for the ground floor and basement of 165 Fleet Street for a mini golf and bowling alley, with a possible associated activity involving consumption of alcohol and food from 10 am to 2 am seven days a week. Late night refreshments and alcohol would be consumed inside and outside from 12.30 - 2.00 am, with the premises closing at 2.30 am.

My business is based next door at 167 Fleet St (referred to as 167 herein after).

We are a professional services firm as are many other tenants at 167. You will no doubt appreciate that the planned activity is not likely to receive approval by us as it will lead to a mix which would change the character of the area (which is a mixture of residential and professional services area - mainly lawyers and accountants) including the building at 165 and others nearby.

There is already an unprecedented amount of development in this area - all catering for professional services and residents as well as the legal quarter - for example, the 22 storey office tower, Peterborough Court/ Daniel House which I am led to believe will attract legal tenants and opposite the road which we are to have the City Police and new Courts.

It seems to me that inviting a Leisure based operator in the immediate vicinity would likely lead to a disruptive anti-social and noisy behaviour given the hours of selling alcohol (in and out) into the narrow pedestrian pathway and probably result in disharmony with the many local users. I fear that as a professional services firm we may see a decline in business given such a use would not fit in this historical area, especially as it does not cater for the current market (legal, accountants, residential).

We would therefore like to register ourselves as a party who "objects" to the granting of any permission to allow any part of the premises next door to be used as a "entertainment" venue

Comments for Planning Application 24/00236/FULL

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Alderwoman Martha Grekos
Leader of Castle Baynard Ward
City of London
Guildhall
EC2V 7HH

18th March 2024

C/O: Planning Officer Liam Hunt
Planning Department
City of London Corporation

BY EMAIL: PLNComments@cityoflondon.gov.uk

Dear Liam,

Re: Planning application for change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis) - Ground Floor Retail Unit 165 Fleet Street London EC4A 2DY

Objection

As Alderwoman of Castle Baynard Ward. I am writing to submit the below representation on behalf of some of the residents in the ward (especially for those living at 6 Bolt Court which is directly behind 165 Fleet Street) for the planning application to covert the ground floor and part basement into leisure facilities (namely a mini golf, ten pin bowling) noodle bar and cafe and ancillary facilities.

Myself and the residents, as well as many others including the Planning Department of the City of London, have objected on strong terms with regards to the licensing application. Those comments still stand not just for the licensing application but also this planning application.

We all want to welcome with open arms new businesses into this area but their planning applications need to be accordance with the City of London's Adopted Local Plan. I have read the application, but apart from the applicant's statement that their application will not impact on or reduce the existing office provision in accordance with policies CS1 (Offices) and DM1.1 (Protection of office accommodation) and that it will not have an impact on the setting of the Fleet Street Conservation Area as there are no proposed external changes, thus being in accordance with policy DM12 (Development in Conservation Areas) and the London Plan and the National Planning Policy Framework policies, there is no mention or consideration of Policy DM 3.5 (Night-time entertainment) or indeed any such considerations for a day-time entertainment,

Local Plan Policy DM 3.5

Policy DM 3.5 states that:

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:*
 - (i) *the amenity of residents and other noise-sensitive uses;*
 - (ii) *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.*

The applicant has failed to provide a Management Statement to detail how these issues will be met. As such, I am objecting to this application as I am not satisfied that the amenity of the residents and other noise-sensitive uses have been considered nor am I satisfied that the environmental amenity has also been taken into account. I give my further reasons below.

Reasons

The applicant has not provided any operating hours of the restaurant or the cafe or the bowling alley/mini golf nor taken into account views from residents and local businesses in designing their premises for night-time entertainment uses and planning the operation of the proposed use to minimise adverse impact on amenity. The only facts as to its operation are in its licensing application - which is separate to this planning application - which states that they will be providing a themed mini golf course bar to show films, play live music and serve alcohol from 10am to 2am every day (and specifically the licence application states to provide late night refreshments inside and outside these premises from 11pm till 2am each day and to sell alcohol onsite and offsite every day from 10am to 2am every day - with premises open to the public till 2.30am).

This is an unacceptable impact on residential amenity, contrary to Policy DM 3.5. Behind 165 Fleet Street, there is a large residential community found on Johnson's Court and Bolt Court. There are also flats at 171 Fleet Street and blocks of flats in Red Lion Court and Crane Court. None have been consulted about this planning application nor the licensing application. In addition, we are welcoming, hopefully shortly if granted consent, a large student accommodation block of 750 residential units opposite 165 Fleet Street (namely 65 Fleet Street, next to the Tipperary). The noise, in the early hours (11pm to 2am) will mean large disturbance to residents' sleep given the premises will be open until 2am and customers will be arriving and leaving the premises then. No other premises on Fleet Street is open beyond 11pm in order to fit in with the local context and to respect the residents' amenity as well as the business community.

The sale of alcohol, inside and outside (but especially outside as there is no outdoor sitting area being provided with this planning application) will mean that there will be an acceptable impact on the environmental amenity, which is contrary to Policy DM 3.5. Given the consumption of alcohol off premises till 2am, potentially there will be an increase in anti-social behaviour at those hours if a license is given to provide alcohol onsite and offsite. No other premises in that area is open until 2am and sells alcohol offsite at those hours. Despite the proposed efforts of the applicant to have a sign to leave quietly and also CCTV footage, this will not abate such nuisance and crime. Such licenced premises will just exacerbate the situation and put the community at risk of increased crime/disorder and public nuisance. Our alleyways and courtyards just off Fleet Street is where such anti-social behaviour will congregate, impacting residents, given that is where the majority of the residential blocks are situated. In addition, there will be more rubbish in those alleyways and courtyards and on the main street and nothing has been suggested as to how to abate all of this. I am already contacted most mornings by local businesses with concerns over the rubbish they find on the streets as they come into work. The new premises license will just fuel the issues we are already trying to control in the area.

Paragraph 3.3.22 of the Local Plan states that: "*Planning applications for new and extended night-time entertainment uses or for variations of planning conditions must be accompanied by a Management Statement that addresses planning amenity issues, sets out how potential impacts on amenity will be addressed through the design of the premises and how they will operate without causing disturbance including: hours of closure to protect amenity; noise mitigation plans related to both internal and external noise, including measures to reduce sound transfer, such as sound-proofing, noise controls and double entry lobbies; arrangements for the storage, handling and disposal of waste; a timed programme for deliveries and collections and other servicing arrangements; measures to deal with the emission of odours; and location of ventilation ducts and plant.*"

Paragraph 3.3.23 of the Local Plan also states that “Assessment of the Management Statement will have regard to the City Noise Strategy, the provisions of the City of London Statement of Licensing Policy and to any submitted licence application operating schedule.”

No such detail has been provided.


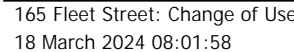
Lastly, the applicant has failed to demonstrate where the mini-golf or cafe will be on the ground/ basement plan. On the submitted ground plan, I can see solely the restaurant proposals. On the submitted basement plan, I can see solely the bowling alley proposals.

Conclusion

As such, given the lack of detail and consideration of Local Plan Policy DM3.5 as well as lack of consultation by the applicant with myself as Leader of Castle Baynard Ward, my fellow ward Councillors as well as residents and businesses in this area, I urge you to decline this application.

With best wishes,

Alderwoman Martha Grekos
Leader of Castle Baynard ward

From: 
To: 
Cc:
Subject: 165 Fleet Street: Change of Use: Objection: 24/00236/FULL PP-12861651
Date: 18 March 2024 08:01:58

THIS IS AN EXTERNAL EMAIL

Change of Use Planning Application 165 Fleet Street, EC4A 2DY : Objection

References: 24/00236/FULL
PP-12861651

Application by Bloomsbury Leisure Holdings Limited re “Tokyo Hit” Castle Baynard Ward My London Flat Address: Flat 14, 6 Bolt Court (off Fleet Street) EC4A 3DQ

I write in support and agreement to the measured and precise submissions of my Ward Councillors (e.g. Graham Packham, Henrika Priest, Martha Grekos) and the objections raised by my neighbours. My understanding is that they are also not in support of the proposals.

My own comments are based on observing and participating in the rhythm of work and life in this specific ward, over two decades of work in this ward, and one decade of living in this ward in our second family home. This is currently let to a fellow mature professional while I work in Scotland before return to the City of London. It is located just behind the Application Premises, adjacent to Dr Johnson’s historic house.

I hope my comments are pertinent to the Council’s review of this Planning Application.

The proposals are directly contrary to the Amenity, Character (both historic and current), and Appearance of this Ward, and to the working and personal lives of those who live or attend here.

It is the wrong activity in the wrong place. My view is that it should not be tempered with concessions, and instead be rejected outright. I am interested in attending the relevant Planning Meeting, subject to work commitments.

My specific observations on the Ward and how the Proposals directly clash are below.

The Ward and immediately neighbouring area are dominated by Professional Service Firms (Legal, Accounting, Financial) and Judicial/Police functions

(Salisbury Square, Royal Courts). The proposed Venue is not an appropriate neighbour in this location.

The historic Ward of Castle Baynard and its immediate neighbourhood is a fine architectural and historic and healthy environment, well placed and connected. The immediate vicinity includes the gothic Royal Courts of Justice, Temple Church and Inns and Lincoln Inns of Court, St Paul's Cathedral and St Brides Church, and in construction Salisbury Square Courts and Police. There is even a Fleet Street Statue to our Mary Queen of Scots. It has distinct Style and identity, with which the proposed Application and Development clashes.

The Proposal may be appropriate to other entertainment areas such Soho or Covent Garden or Camden. Not here.

I have not previously worried about inevitable late night working and commuting for male and female employees and residents, young or mature, and my own Family. I will if this Application is granted.

The Ward and its historic surrounds are an enclave of remarkable calm and civility, during and after work hours, in a network of foot lanes.

The proposed venue will attract large groups who are not committed to and responsible for continuing work or living in the Ward.

The Evening Standard reported the implications at the Applicants' site in Camden:

<https://www.standard.co.uk/news/crime/bloomsbury-bowling-lanes-scraps-hip-hop-and-urban-music-nights-in-wake-of-nearfatal-stabbing-a3174186.html>.

The Police made urgent demands for Camden Council to review critically the late night Alcohol and Entertainment Licenses, to deal with the aftermath of a mass brawl and near fatal stabbing linked to the venue. Camden did not withdraw the License, demonstrating that a fait accompli is too late to amend.

I have lived in Brighton and seen the impact of Amusement Emporia, in terms of the Clientele attracted, the ensuing behaviours, and the ambience created. All negative.

I have lived and worked in Edinburgh and am embarrassed at the view of Princes Street Georgian New Town buildings from Princes Street Gardens and Edinburgh Castle, trashed by gaudy and transitory and unedifying retail outlets.

I hope this is not allowed to happen here.

Andrew Gavan
[REDACTED]

Comments for Planning Application 24/00236/FULL

Application Summary

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Case Officer: Liam Hart

Customer Details

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Address: Flat 14 6 Bolt Court London

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Flat 9.

6 Bolt Court

London EC4A 3DQ

19 March 2024

Re: Change of Use Planning Application 165 Fleet Street EV4A 2DY: Objection References:
24/00236/FULL

Applicant: Bloomsbury Leisure Holdings Limited re “Tokyo Hit”

My name is **Michael Harris**. I am a Director of Gough House Limited, the owner of the freehold of the building at 6 Bolt Court known as Gough House. I and my wife (**Professor Emerita Rebecca Bailey-Harris** who prepared our Objection to the company’s Licensing Application) are the joint owners of Flat 9, one of twenty-two in the building. We have lived in our flat since February 2007. I write to object to the above Planning Application. Like my neighbour **Mr Andrew Gavan** who has already submitted an objection I seek an outright rejection of this application and, to quote him, I too do not believe the committee’s decision should be “tempered with concessions”. I now set out my reasons for this view (which my wife has authorized me to say are adopted by her in their entirety).

The starting point must be **Local Plan Policy DM 3.5** (of which there is no mention in Applicant’s statement) which states:

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:

(i) the amenity of residents and other noise sensitive uses;

(ii) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of 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.

As **Alderwoman Grekos’s** excellent objection demonstrates the disclosed facts of the application show that the operation of the enterprise, especially the sale of alcohol until the incredible hour of **02:00**, and also extraordinary, closure of the building not until **02:30**, must inevitably produce an unacceptable impact on *residential amenity*, not only for our building, but also for the numerous other residential properties in the precinct as well as for the projected student accommodation. I adopt in its entirety her argument on this point. As I do the excellent and trenchant observations (with supporting photographs) in the objection of **Mr Toby Brown** a resident of 6 Bolt Court. As he observes, the conditions of sale of alcohol as envisaged in the application will, as “experience and common sense” tell us, inevitably mean that some of the patrons will be drunk and will spill out into Bolt Court and into other areas of this historic precinct, notably Gough Square, and that they will “inevitably cause a public nuisance and/or

commit [a variety of] criminal offences” which he proceeds to identify. He goes on to say that “these are not academic or unlikely concerns”, but rather the ineluctable conclusion reached on the basis of common sense. He concludes, as do I, that the impact of this wholly predictable outcome will have a devastating impact on the lives of residents: “In reality, such noise, urination etc. will blight their lives given the proposed licensing hours end at 2am” and to exacerbate matters these hours run through the weekend. Similar arguments are made by **Alderwoman Grekos** in her powerful treatment of the predictable consequences of the way alcohol is to be sold and the hours of its sale, especially outside the premises, on *environmental amenity*: “Given the consumption of alcohol off premises till 2am, potentially there will be an increase in anti-social behaviour at those hours... No other premises in that area [are] open until 2am and [sell] alcohol offsite at those hours.” Both she and **Mr Brown** refute the idea that the applicant’s “mitigations of CCTV and signage to leave quietly” will in reality do anything to obviate the risks of public nuisance and the other forms of disgusting anti-social behaviour **Mr Brown** identifies in his objection.

I ought in closing to pick up on two other eloquent and important objections by resident owners in our building, those of **Mrs. Rosemarie Hutchinson** and **Mr Andrew Gavan**. Both emphasise the impact the proposed application will have on the *special historic interest* of this part of the City. **Mrs. Hutchinson** points up the crucial fact that “this leisure venue will undoubtedly change the character of the area ... The leisure venue proposed is not sympathetic to the area. Other leisure facilities in the area include historic pubs and the Dr Johnson museum. These traditional venues situated in an historic area will suffer damage from a brash [*good word!*] venue open ****sixteen hours** [my emphasis] a day with an active frontage in such close proximity.” **Mr Gavan** makes the important point that the area affected by the proposal is “dominated by Professional Service Firms (Legal, Accounting , Financial) and Judicial/Police functions (Salisbury Square, Royal Courts [of Justice and the Inns of Court]) ... The Ward and its historic surrounds [is] an enclave of remarkable calm and civility [*most important to our quality of life*] ...” He concludes that we must not allow a development that in his experience will encourage behaviour destructive of this special character and ambience.

I completely agree and for this and all the other reasons set out in this objection urge the rejection of this unmeritorious proposal. I conclude by adopting **Alderwoman Grekos’s** impeccable **Conclusion** on this ill- conceived Application: “[G]iven the lack of detail and consideration of Local Plan Policy DM3.5 *as well as lack of consultation* [my emphasis - utterly deplorable] by the applicant with myself as Leader of Castle Baynard Ward, my fellow Ward Councillors as well as residents and businesses in this area, I urge you to decline this application.”

As indicated at the outset of this objection I too urge its outright rejection.

Michael Harris

** In fact **161/2** hours!

Comments for Planning Application 24/00236/FULL

Application Summary

Application Number: 24/00236/FULL

Address: Ground Floor Retail Unit 165 Fleet Street London EC4A 2DY

Proposal: Change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis).

Case Officer: Liam Hart

Customer Details

Name: Ms M G

Address: 1 Fetter Lane London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I am writing in my capacity as Director of a company based a few doors away from the proposal. I object to this application. The trading hours of 2am and serving of alcohol inside and outside will have a huge detriment to the amenity of the area. Especially when there is no outdoor space for such clientele and also narrow alleys ways and courtyards which will attract antisocial behaviour. Residents will be impacted by noise and businesses will be affected by the nuisance they will find on their doorsteps, especially the next morning (vomit; litter; urine etc). The floor plates of the proposed scheme are enormous and it looks like the footfall will be about 1,000-2,000 people daily. How can this amount of people be catered in the Fleet Street area given the narrow pavements and also as a processional route to St Paul's Cathedral? The intensity of the use is certainly not appropriate for this conservation area or heritage area. As much as we want to welcome new businesses into the area, these businesses need to be mindful of the area they are coming into and the people that work and live here. This scheme will also attract business away from current pubs and eateries and will certainly attract the wrong crowd after 10/11pm at night. Everything closes for a very good reason around this area come 10/11pm. Because there are residents and also businesses. It is the legal quarter after all and we want to retain it as such. I urge you to decline the application given the applicant has not considered the impact it will have on the area and also that they have not consulted anyone about their scheme.

Comments for Planning Application 24/00236/FULL

Application Summary

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Case Officer: Liam Hart

Customer Details

Name: Ms Katherine Lau

Address: Flat 8, 6 Bolt Court city of london

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: build it elsewhere please! as much as the bar can try to diminish and regulate the behaviour of patrons, its often hard to do so especially when the customers leave for a smoke/do drunk stuff on the street post pints and whatnot. and the people that would suffer the most are arguably the people living in the area (i used to live above a club. its quite jarring to hear people talking, smoking and going crazy on the street so loudly when you're right in your room trying to wind down)

residents in the area really wish to get a good nights rest or like. A peaceful night. and we pay quite abit for rent in such an area so please dont build something like that so close to us! Soho and covent garden are literally so close so go ahead and build that bar thing there! i would support it wholeheartedly i looove a good noodle bar and bowling whatever if its not smack in my home yea?

Comments for Planning Application 24/00236/FULL

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Case Officer: Liam Hart

Customer Details

Name: Dr Kirsty Mann

Address: Flat 19, 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I OBJECT to the planning application for 165 Fleet Street.

I am the owner of Flat 19, 6 Bolt Court, London EC4A 3DQ, a residential building within metres of 165 Fleet Street.

It is my opinion that the proposed facility will have a significantly detrimental effect on local residents on account of noise, pedestrian traffic and antisocial behaviour where consumption of alcohol is involved. 165 Fleet street is accessible via an alleyway that directly passes the entrance to 6 Bolt Court's and will be an inevitable thoroughfare for the many potential revellers coming and going from the proposed premises. Bolt Court is a peaceful sanctuary enjoyed by residents and this proposed premises will certainly disrupt that peace.

I do not believe that a mini golf course/ bowling alley adds any value to local residents and is likely to attract antisocial behaviour. This kind of venue would be better suited in an area that is not residential.

I object to this planning request.

Yours Sincerely

Kirsty Mann

Comments for Planning Application 24/00236/FULL

Application Summary

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Case Officer: Liam Hart

Customer Details

Name: Efstathios Kapelis

Address: 6 Bolt Court Flat 20 London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: I agree with Alderwoman Martha Grekos

Comments for Planning Application 24/00236/FULL

Application Summary

Application Number: 24/00236/FULL

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Case Officer: Liam Hart

Customer Details

Name: Mr David Canty

Address: 10 4 crane court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: i live very close to this venue between red lion and crane court. I believe this change of use will lead to significant additional noise and anti social behaviour. The potential market for this proposed business are not local so there may also be disruption from car traffic and additional badly parked ebikes.

Comments for Planning Application 24/00236/FULL

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Case Officer: Liam Hart

Customer Details

Name: Mr Yikai Zhang

Address: Flat 7, 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I am the owner of Flat 7, 6 Bolt Court, London EC4A 3DQ, a residential building within metres of 165 Fleet Street. I strongly object to the development of this venue as it will cause disturbance to the residential neighbourhood and introduce more antisocial behaviour.

Comments for Planning Application 24/00236/FULL

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Case Officer: Liam Hart

Customer Details

Name: Dr Mark Yates

Address: 24 Middleton Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I object to this planning application.

I used to live and work near Fleet Street and believe the proposed development is not in keeping with the local area, and is within 20 metres of a residential building making noise and other disturbances inevitable if permission is granted.

The application is clearly not in keeping with the Local Plan, and the intended use will impact on nearby residents' right to quiet enjoyment of their property, and uninterrupted sleep between 11pm and 7am.

This is not an appropriate development for this historic area of the city, in very close proximity to a residential building.

Comments for Planning Application 24/00236/FULL

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Case Officer: Liam Hart

Customer Details

Name: Miss Kristy Fok

Address: Flat 21, 6 Bolt Court Fleet Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: Agree with Alderwoman Martha Grekos

Comments for Planning Application 24/00236/FULL

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Case Officer: Liam Hart

Customer Details

Name: Mr Christopher Field

Address: Flat 22 6 Bolt Court London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: My wife and I strongly object to the plans to develop 165 Fleet Street into a bowling and golfing venue for the reasons set out by Martha Grekos. It will attract anti social behaviour in sn areas that is close to a quiet residential building - 6 Bolt Court. The narrow alley ways would become a thoroughfare and a place to loiter, for the venue's customers which would make it unbearable for the residents of Bolt Court given the layout of the courtyard. Such a venue should not be located near residential buildings.

Comments for Planning Application 24/00236/FULL

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Case Officer: Liam Hart

Customer Details

Name: Mr Michael Radford

Address: 6 Market Mews Market Mews Godalming

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: I agree with and support the comments submitted by Alderwoman Martha Grekos.

Regards Michael Radford for Rozecroft Limited

Comments for Planning Application 24/00236/FULL

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Case Officer: Liam Hart

Customer Details

Name: Dr Charlotte Spencer

Address: 2 Warwicks Bench Road Guildford

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment:.

I reside in a flat in Gough House, Bolt Court several nights a week whilst working as a Research Pathologist at the Cancer Research UK (CRIK) Laboratories at UCL (University College Hospital).

I work late into the evening and am concerned that the environment will become unsafe if a business serving alcohol for 16 hours a day, for consumption on and off the premises, is opened at 165 Fleet Street in such close proximity to Bolt Court. I have no wish to encounter individuals who have been consuming alcohol just to get to my door. Furthermore the courts off Fleet Street, through which I walk, are, by their historic nature, quiet and labyrinthine and as such lend themselves to various other criminal activities that can be associated with night time venues such as dealing and consumption of illegal substance. There will undoubtedly be the potential for an increase in other crimes.

I have first hand experience, as an Accident and Emergency doctor, of the damage done by excessive alcohol consumption such as is facilitated by licensing hours of 16 hours a day. My experience includes dealing with the personal injuries incurred by individuals as a result of being drunk, and also includes treating the perpetrators and victims of alcohol fuelled violence, including murder.

The area has immense historic character and is currently a quiet residential area and an important business and legal hub. A night time venue at 165 Fleet Street with extended opening hours would have a profound adverse effect on the peaceful character of the area and lead to disturbance for the residents, it is an inappropriate business for the site.

I strongly object.

Comments for Planning Application 24/00236/FULL

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Case Officer: Liam Hart

Customer Details

Name: Mr Allan O'Neill

Address: Spyways Doverdale Droitwich

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: I write in support and agreement to the measured and precise submissions of my Ward Councillors (e.g. Graham Packham, Henrika Priest, Martha Grekos) and the objections raised by my neighbours. My understanding is that they are also not in support of the proposals.

My own comments are based on observing and participating in the life of this specific ward for over 10 years, having spent the majority of that time living in Bolt Court during the week for professional reasons. I am now a landlord and let the flat to a professional Public Affairs consultant. My flat (15 Bolt Court) is located just behind the Application Premises, adjacent to Dr Johnson's historic house.

I hope my comments are pertinent to the Council's review of this Planning Application.

The proposals are directly contrary to the Amenity, Character (both historic and current), and Appearance of this Ward, and to the working and personal lives of those who live or attend here.

It is the wrong activity in the wrong place. My view is that it should not be tempered with concessions, and instead be rejected outright. I am interested in attending the relevant Planning Meeting, subject to work commitments.

The Ward and immediately neighbouring area are dominated by Professional Service Firms (Legal, Accounting, Financial) and Judicial/Police functions (Salisbury Square, Royal Courts). The proposed Venue is not an appropriate neighbour in this location.

The midweek noise from straggling drunks is already a noticeable problem and one which will be seriously exacerbated by a golf and bowling alley with an all day alcohol license that runs until 2am with the freedom for live music. The ward will just become an anti-social mess of your own making. It is just simply ridiculous and unnecessary to grant this application in this specific area. There are no positives to the existing residents or businesses in this area and it merely reduce the character of the ward.

Please find a nice quiet restaurant to open up!

From: [REDACTED]
To: [REDACTED]
Subject: OBJECTION to 165 Fleet street proposal 24/00236/FULL
Date: 29 March 2024 15:17:15

THIS IS AN EXTERNAL EMAIL

Dear Mr. Hunt,

OBJECTIONS to the licensing application stated in my direct email to Mr. Robert Breese, COL licensing officer, apply as well to the planning application, and are similar to and in complete agreement with objections stated by Alderwoman Martha Grekos and the other flat owners/residents of 6 Bolt Court. Ultimately, the planning application is NOT compliant with Policy DM 3,5 and thus, must be REJECTED.

Kind Regards,

Noel Chun
6 Bolt Court

From: [REDACTED]
To: [REDACTED]
Subject: OBJECTION to 24/00236/FULL - 165 Fleet St
Date: 29 March 2024 15:31:58

THIS IS AN EXTERNAL EMAIL

Dear Mr. Liam Hunt,

OBJECTIONS to the licensing application stated in my direct email to Mr. Robert Breese, COL licensing officer, apply as well to the planning application, and are similar to and in complete agreement with objections stated by Alderwoman Martha Grekos and the other flat owners/residents of 6 Bolt Court. Ultimately, the planning application is NOT compliant with Policy DM 3,5 and thus, must be REJECTED.

Kind Regards,

Noel Chun
6 Bolt Court

From: [REDACTED]
To: [REDACTED]
Subject: 24/00236/FULL - 165 Fleet St
Date: 29 March 2024 15:36:43

THIS IS AN EXTERNAL EMAIL

OBJECTIONS to the licensing application stated in my direct email to Mr. Robert Breese, COL licensing officer, apply as well to the planning application, and are similar to and in complete agreement with objections stated by Alderwoman Martha Grekos and the other flat owners/residents of 6 Bolt Court. Ultimately, the planning application is NOT compliant with Policy DM 3,5 and thus, must be REJECTED.

Kind Regards,

Noel Chun
6 Bolt Court

Comments for Planning Application 24/00236/FULL

Application Summary

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Case Officer: Liam Hart

Customer Details

Name: Noel Chun

Address: 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:OBJECTIONS to the licensing application stated in my direct email to Mr. Robert Breese, COL licensing officer, apply as well to the planning application, and are similar to and in complete agreement with objections stated by Alderwoman Martha Grekos and the other flat owners/residents of 6 Bolt Court. Ultimately, the planning application is NOT in accordance with Policy DM 3,5 and thus, must be REJECTED.

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Case Officer: Liam Hart

Customer Details

Name: Mrs Margaret Mann

Address: 11 Lonsdale Square London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: I object to this planning application. I have a close connection to this area as my husband works in Fetter Lane, our daughter owns a flat in Bolt Court and I have attended St Bride's Church for 45 years.

I consider the planning proposal to be entirely inappropriate for an area which consists of professional service firms and residential accommodation. It is inconsistent with the Local Plan to conserve the City's heritage assets.

This development will inevitably bring noise and antisocial behaviour to the area and particularly to Bolt Court which is situated just metres away.

Comments for Planning Application 24/00236/FULL

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Case Officer: Liam Hart

Customer Details

Name: Mr Julian Cooper

Address: 1 Fetter Lane London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am a planning and property consultant based at Fetter Lane, just round the corner from 165 Fleet Street where the new bowling alley and mini golf course is seeking consent.

I object to the planning application for the following reasons:

(1) contrary to DM12.2 of Local Plan as it doesn't not preserve or enhance the character or appearance of the conservation area. Fleet Street is in a conservation and is the main processional route to St Paul's Cathedral. Conservation areas are defined as designated heritage assets and so this development proposal does not sustain or enhance the setting or its significance. Having a leisure venue that will have a footfall of over 1,500 people a day, selling alcohol inside and outside those premises until 2am, is not in keeping of an area that its rich in history and listed buildings. Its use does not sit at all well within the existing street patterns; the setting; nor the frontage it proposes on Fleet Street.

(2) contrary to DM3.5 of the Local Plan as the applicant has not demonstrated that there is no unacceptable impact on residents and other noise sensitive users as well as the environmental amenity. Behind 165 Fleet Street are residential courtyards where many residents live. Opposite 165 Fleet Street is the new proposals for over 750 student housing accommodation. Given 165 Fleet Street has no outdoor space, its proposed clients will create nuisance and anti social behaviour given alcohol can be consumed outside and inside until 2am. Residents will not be able to sleep and businesses will be disturbed too. No level of security or CCTV will reduce these impacts. The new court and police station are also just being built on Fleet Street, so they will also be impacted by such a use in the area. If the Corporation is trying to regenerate this area into a

stronger legal quarter and bring forward a museum of print to celebrate the history of this area, then a bowling alley/mini golf course is certainly not in keeping or an appropriate use locally.

Comments for Planning Application 24/00236/FULL

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Customer Details

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Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

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(2) contrary to DM3.5 of the Local Plan as the applicant has not demonstrated that there is no unacceptable impact on residents and other noise sensitive users as well as the environmental amenity. Behind 165 Fleet Street are residential courtyards where many residents live. Opposite 165 Fleet Street is the new proposals for over 750 student housing accommodation. Given 165 Fleet Street has no outdoor space, its proposed clients will create nuisance and anti social behaviour given alcohol can be consumed outside and inside until 2am. Residents will not be able to sleep and businesses will be disturbed too. No level of security or CCTV will reduce these impacts. The new court and police station are also just being built on Fleet Street, so they will also be impacted by such a use in the area. If the Corporation is trying to regenerate this area into a

stronger legal quarter and bring forward a museum of print to celebrate the history of this area, then a bowling alley/mini golf course is certainly not in keeping or an appropriate use locally.

From: [REDACTED]
To: [REDACTED]
Subject: Objection: Planning Application - 165 Fleet Street EC4A 2DY
Date: 31 March 2024 13:03:31
Attachments: [image001.png](#)
Importance: High

Dear Sir / Madam

I am writing to strongly object to the planning application – item number below – via email as I was unable to do so online due to a fault with your server:

[24/00236/FULL | Change of use of part ground floor and part basement floor from commercial use \(Class E\) to a mixed use including a noodle bar with cafe and part leisure \(mini golf\) at ground floor level, and ten pin bowling and ancillary facilities at basement level \(Sui Generis\). | Ground Floor Retail Unit 165 Fleet Street London EC4A 2DY](#)

I understand that the anticipated daily footfall will be in the region of 1,000 to 2,000 people. This coupled with a closing time of 2.00 am (recent licence application) would be absolutely disastrous for the surrounding residential area given the impact that this footfall would have in terms of noise and antisocial behaviour. The surrounding alleyways and courts, and Fleet Street itself would not be able to handle this number of people. To this point, I'd also like to stress that there is no management statement, contrary to Policy DM3.5 which requires it, from the applicant to demonstrate that there will be no unacceptable impact on the local amenity. Moreover, this area is part of the processional route to St Pauls, close to the Fleet Street conservation area with its rich press history, and will be the centre of the new law courts: I fail to see what this type of business can bring to those who live and work here? It's a pure destination venue for people who have no links to the area, and because of its size with the anticipated footfall will cause issues which will then be left to the locality to deal with.

Finally, there's been no contact or consultation with local councillors, or stakeholders as to how this venture could benefit the local area, or as the applicants must now understand, given the number of objections, alleviate our concerns which shows an astonishing disregard and arrogance.

Yours faithfully

Henrika Priest

(Local resident and Common Councilman)



Henrika Priest | Common Councilman – Castle Baynard Ward
City of London Corporation | Guildhall | Gresham Street | London EC2V 7HH

www.cityoflondon.gov.uk | <https://castle-baynard.org.uk/>

Comments for Planning Application 24/00236/FULL

Application Summary

Application Number: 24/00236/FULL

Address: Ground Floor Retail Unit 165 Fleet Street London EC4A 2DY

Proposal: Change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis).

Case Officer: Liam Hart

Customer Details

Name: Mr John Griffiths

Address: Rocket Science Tallis House, 2 Tallis Street London

Comment Details

Commenter Type: Councillor/Ward Member

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I am writing to oppose the application for the change of use to the ground floor retail unit at 165 Fleet Street, EC4A 2DY which contravenes policy DM 3.5 of the Local Plan.

The proposed mixed uses, including a late-night leisure offer of mini-golf and ten-pin bowling, will significantly impact on the quality of life of the local area which has an increasing residential component.

The area comprises numerous surrounding alley ways and small courtyards which will not support the anticipated numbers visiting the proposed premises late into the evening, generating noise and anti-social behaviour. The proposal is also out of keeping with the ongoing development plans for the area which are to combine Fleet Street's heritage and traditional function as a processional route with its new status as the centre for the City's courts and police.

Comments for Planning Application 24/00236/FULL

Application Summary

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Case Officer: Liam Hart

Customer Details

Name: Mr Joseph Sullivan

Address: 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: My wife and I live on the ground floor of a nearby building and we have serious concerns about the levels of increased noise and public nuisance that this a mixed use noodle bar/cafe/mini golf course/ten pin bowling alley would bring. Speaking plainly, allowing live and recorded music and the sale of alcohol until 2am will naturally cause a significant disturbance to our sleep as well as the sleep of other residents. No other premises in this area are open as late as this one hopes to be, and the nature of this quiet community will change overnight for the worse if this is allowed to proceed.

We also have concerns about increased anti social behaviour and crime that will seep into the small alleys off of Fleet Street should this new property continue with their plans. These alleys are not designed to be high traffic areas, and by allowing this mixed use space to open, the increased foot traffic will inevitably lead to more discarded rubbish, dangerous debris such as broken glass, and the increased potential for criminal and unhoused populations to take root.

Comments for Planning Application 24/00236/FULL

Application Summary

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Case Officer: Liam Hart

Customer Details

Name: Miss Catherine McGuinness

Address: Guildhall London

Comment Details

Commenter Type: Councillor/Ward Member

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: This is an entirely inappropriate application for the location.

It is clearly aimed at attracting custom into the early hours. That is likely to have a negative impact, particularly for the residents in what is a mixed business/residential area with an already delicate balance between the two. Many residents live in the courts and alleys off Fleet Street, or in flats above Fleet Street, and any addition of footfall late into the night - even if it is quiet, which footfall to and from a place of entertainment of the type proposed may very well not be - is likely to cause disturbance.

In this context I understand that no Management Statement has been provided to demonstrate the impact on the local amenity. As such this application contravenes policy DM 3.5 of the local plan.

The proposal is also out of keeping with the heritage of the area - close to Dr Johnson's House, and already at the heart of legal London, even before the new courts complex at Salisbury Square is opened.

Comments for Planning Application 24/00236/FULL

Application Summary

Application Number: 24/00236/FULL

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Proposal: Change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis).

Case Officer: Liam Hart

Customer Details

Name: Mr Darren Shapland

Address: Flat 11 Gough House Bolt Court City of London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment:As per my comments per the main planning application, this proposal is ridiculous in a quiet part of London in the evening. It would be absolutely out of character with the area and is not appropriate

Toby Brown
Flat 10
6 Bolt Court
London, EC4A 3DQ

1 April 2024

Dear City of London Planning

Re: objection to planning application 24/00236/FULL “Change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis). | Ground Floor Retail Unit 165 Fleet Street London EC4A 2DY”

I write as a local resident to object strongly to the above planning application. By way of background, I live next door at 6 Bolt Court, where I have been permanent resident for 13 years, and I work nearby as a barrister.

Publicity of planning application

Before making my four objections, I would like to flag that it is unclear whether the planning application was publicised properly. Whilst over 40 people have submitted objections to the related application for a premises license, as of today’s deadline, far fewer have submitted objections to the planning application, likely because they are unaware of it.

For example, no notice was posted to the side of the building in St Dunstan’s Court (unlike the notice about the premises license), being where residents of 6 Bolt Court would more likely see any notice. Nor were residents at 6 Bolt Court sent notice in the post, notwithstanding we live next door.

Accordingly, it should be assumed that the same local residents who objected to the related premises application would also have objected to this planning application.

(1) Fleet Street Conversation Area

My first objection is that the proposed change of use would **not accord with the character of Fleet Street per the Conservation Area**.

Notable features of the Fleet Street Conversation Area include legal history, ceremonial grandeur, Dickensian alleyways and courtyards, a Grade 1 listed church, the famous newspaper connection, historic pubs and Dr Johnson’s House.

The proposed change of use to a late-night bowling alley and mini golf leisure facility (which apparently could see 1,000 to 2,000 visitors per day/night), does not accord with the character of the Fleet Street Conversation Area.

(2) Unacceptable impact on amenity to residents: street noise

Per the City of London’s Local Plan, Policy DM 3.4 on 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:

- the amenity of residents and other noise-sensitive uses;*
- 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.”

The application has failed to demonstrate (in a Management Statement or otherwise) that there will be no unacceptable impact on the above issues.

In any event, it is clear from the 40+ objections to the related application for a premises license that local residents believe that the proposed change of use would lead to an **unacceptable impact on the amenity of local residents.**

Next door to the premises is Bolt Court, where our residential building is located. Residents also live next door or nearby including on Fleet Street, Johnston’s Court, Red Lion Court.

St Dunstan’s Court, showing the premises at 165 Fleet Street on the right (looking South towards Fleet Street)



Bolt Court, showing the residential premises 6 Bolt Court on the left (looking East from the edge of St Dunstan’s Court i.e. just next to the proposed licensed premises)



The proposed change of use will clearly lead to unacceptable impact of **noise from guests arriving and leaving, and in congregating such as to smoke and vape.** The scale of the venue means that hundreds if not thousands of guests could pass through each day and night. As the above photo shows, such guests will inevitably fill the narrow St Dunstan’s Court, and many will spill into and congregate in Bolt Court.

Many guests will obviously be noisy and rowdy. The impact on residents of 6 Bolt Court and elsewhere from this noise will be unbearable to our ability to sleep. Particularly given that the related licensed premises application seeks a closure hour of 2.30am.

This will be worsened by the acoustics of Bolt Court, the shape of which amplifies sound from the bottom of the courtyard.

As Mr Tony Newman, Senior Planning Officer (Planning Enforcement) at the City notes in his email dated 28 February 2024 regarding the related licenses premises application:

“There are a large number of nearby residential occupiers, particularly those immediately to the south of the site, that could be negatively affected by the proposed operation of licensable activities, namely the provision of alcohol sales for consumption on and off the premises until 2am Monday to Sunday, and the spilling out of large numbers of people into the surrounding streets and alleyways in the early hours of the morning when (02:00 Monday to Sunday) when there is an expectancy for local residential occupiers to be able to sleep.” (emphasis added)

(3) Unacceptable impact from bowling activities, noise spill and cooking odours etc

Thirdly, the proposed change of use may also result in unacceptable levels of **sound escaping the premises**, given that the planning application seeks to operate a bowling alley and mini-golf leisure centre, and given that the related premises application seeks to play recorded and live music.

Yet no measures such as sound proofing have been proposed to explain how noise levels from the proposed operations will be managed to avoid disturbance.

Nor is any information given as to how kitchen **odours** from the noodle bar will be addressed.

As Ms Claire Callan-Day, Environmental Health Technician in the City’s Pollution Control Team states in her representation dated 26 February 2024 regarding the related premises license application:

“In the absence of adequate information as to how noise at, or associated with, the premises will be controlled I wish to make a representation in respect of this application on the basis of public nuisance.

I have particular concerns as to how amplified music spill, noise associated with the bowling, noise from patrons outside (for smoking, etc.) and dispersal noise will be controlled as there is a significant risk that if not managed robustly there will be a detrimental impact to those in the environs of the premises, in particular residents and other noise sensitive receptors.

*I also believe that there is risk that public nuisance could be caused by noise associated with the offering of food at a late terminal hour, i.e. **the noise associated with bins being emptied and other food-service related noise.***

Furthermore, there is a potential risk of **public nuisance caused by odour and fumes** from the premises given that I have no information to inform me to the contrary.” (emphasis added)

(4) Unacceptable impact for residents and environment from drunk patrons

Fourthly, **many guests from the proposed change of use will have drunk alcohol** and a proportion will be drunk, unacceptably impacting the amenity of residents and the environmental amenity in St Dunstan’s Court, Bolt Court and in other nearby streets. This is from the likely anti-social behaviour, public nuisance and/or crimes of:

- (a) Public urination and vomiting;**
- (b) Littering of cigarette butts, disposable vapes, and drinks containers;**
- (c) In some cases, abusive/threatening language to residents/office workers;**
- (d) In the worse cases, fights/violent disorder from drunk or high patrons.**

Such impact will be worsened by the fact that the narrow St Dunstan’s Court, Bolt Court and other nearby alleyways/court yards are unfortunately “perfect” places for people to urinate and conduct other such activities, given they are away from the spotlight of the main road. Please see the photos from St Dunstan’s Court and Bolt Court of recent public urination:



Conclusion

Finally it is noted that the Applicant, in contravention of Policy DM 3.5 at para 3.3.21, has made no effort to engage with local residents who would be affected by the proposed change of use.

Regrettably this suggests that the Applicant cares little about understanding the local context and local sensitivities, and does not suggest that the Applicant has or will ensure the proposed operation avoids the likely adverse impact on amenity.

In reality, a 10 pin bowling alley and mini-golf facility which runs until 2.30am 7 days a week with music and the sale of alcohol is simply incompatible with preserving the amenity of the residents who live next door and nearby.

For these reasons, the Corporation is asked to reject the planning application.

I would be grateful to be given notice of any oral hearing of the application.

Yours sincerely,
Toby Brown

Comments for Planning Application 24/00236/FULL

Application Summary

Application Number: 24/00236/FULL

Address: Ground Floor Retail Unit 165 Fleet Street London EC4A 2DY

Proposal: Change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis).

Case Officer: Tony Newman

Customer Details

Name: Miss Vasiliki Manta

Address: 108 Fleet Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am writing in my capacity as a Manager of an Optical Practice a few doors away from the proposal. I object to this application. The proposed area lacks sufficient outdoor space to accommodate the visitors drinking until 2 am. Moreover, the lack of adequate monitoring infrastructure raises concerns about potential antisocial behaviour, which could negatively affect the well-being of residents and businesses in the vicinity. Hosting late-night activities without proper infrastructure for noise control and aftermath cleanup poses a significant risk to the tranquility of the area. Increased footfall could result in excessive noise disturbances and lead to issues such as littering and public intoxication, creating an unwelcome environment for both residents and businesses. The anticipated increase in footfall around Fleet Street may overwhelm the existing infrastructure and disrupt the established character of the financial quarter. This could have adverse effects on the local businesses, including pubs and eateries, by diverting customers and attracting the wrong crowds, particularly after 11 pm. It is essential to prioritize the preservation of the unique character of the financial quarter while welcoming new businesses and footfall. Any developments should be mindful of the existing residents and businesses, ensuring that they are not adversely affected by changes that compromise the area's identity and charm. In light of these concerns, I urge the relevant authorities to decline this application. It is crucial to strike a balance between promoting economic growth and preserving the quality of life for residents and businesses in the area.

Comments for Planning Application 24/00236/FULL

Application Summary

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Case Officer: Tony Newman

Customer Details

Name: Ms Amanda Singleton

Address: Flat 7, 7 Wine Office Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I object on the same grounds detailed in the document submitted by Alderwoman Martha Grekos.

Fleet St is not a late night entertainment area and I am concerned about the noise disturbance and increase in anti social behaviour that this venue would cause to myself and other local residents.

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Re: RE: PLANNING APPLICATION 24/00236/FULL 165 FLEET STREET PLEASE NOTE CORRECT DATE 10 APRIL 2024 IN TEXT
Date: 09 May 2024 12:02:27

THIS IS AN EXTERNAL EMAIL

Hallo,

My address is Flat 4, 4 Pemberton Row, EC4A 3BA

If the street address would suffice, could you use 4 Pemberton Row, EC4A 3BA.

If you need to use my full address, I am content for my flat number to be included.

Kind regards,

Jeremy

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

From: PLNComments@cityoflondon.gov.uk

To: [REDACTED]

Sent: Thursday, May 9th 2024, 11:06

Subject: RE: PLANNING APPLICATION 24/00236/FULL 165 FLEET STREET PLEASE NOTE CORRECT DATE 10 APRIL 2024 IN TEXT

Hello,

For this comment to be registered, please provide an address.

Thanks,

Rianne

From: [REDACTED]
Sent: Monday, May 6, 2024 7:27 PM
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Cc: Callan-Day, Claire [REDACTED]
Subject: PLANNING APPLICATION 24/00236/FULL 165 FLEET STREET PLEASE NOTE CORRECT DATE 10 APRIL 2024 IN TEXT

THIS IS AN EXTERNAL EMAIL

I write to object to planning application 24/00236/FULL for 165 Fleet Street London EC4A 2DA.

I have both worked in and am a resident of the area. I worked in Pemberton House for a number of years prior to its conversion to apartments by Barratt Homes, and have been a resident of Pemberton Row for the last 26 years. I have known the area for well for over 40 years.

Having read recent submissions about the application, I am in agreement with the various representations, in particular on the following areas of concern:

- i. the unacceptable loss of amenity to residents. The application is not in conformity with the City's Local Plan Policy DM3.5;
- ii. the unacceptable noise break-out that is likely to result from the proposed activities, in particular from the bowling alleys;
- iii. the potential for considerable nuisance to local residents late at night and in the early hours of the morning in the historic lanes and alleys to the north of Fleet Street whether from crapulence, vomiting, urination, littering or public disorder; preventing the quiet enjoyment of people's homes.

I will not repeat in detail the concerns already raised.

However a couple of points deserve mention:

At the Licensing Hearing for the premises held on 10 April 2024, Appendix 2 i) of the Public Document Pack included the following statement from Claire Callan-Day of the City's Environmental Control Team:

" I have particular concerns as to how amplified music spill, noise associated with the bowling, noise from patrons outside (for smoking, etc.) and dispersal noise will be controlled as there is significant risk that if not managed robustly there will be a detrimental impact on those in the environs of the premises, in particular residents and other noise sensitive receptors."

Ms Callan-Day makes a very pertinent point, which the Planning Committee will need to consider carefully in their deliberations.

The Committee should also consider the Supplementary Planning Document "Fleet Street Conservation Area Character Summary and Management Strategy" adopted on

23 February 2016. In the section on character analysis - reference is made to the alleys and courts north of Fleet Street:

" As well as their historic value, the courts provide a series of intimate spaces and pleasing incidents in the townscape that contrast dramatically with the hubbub of Fleet Street."

The Committee should note the comment about the "hubbub of Fleet Street", contrasting dramatically with the *"series of intimate spaces and pleasing incidence"* in the alleys and courts.

Would the City of London Corporation be happy to damage the amenity of these intimate spaces which have existed for more than three centuries, as clearly shown by the famous map of John Rocque, published by Act of Parliament in October 1746? This close patchwork of business and residential properties is an important part of the Fleet Street Conservation Area.

I have discussed this planning application with other long leaseholders at my address. They are also concerned about this application and are in agreement with these representations.

We would ask that the planning application 24/00236/FULL be rejected.

Thanks you.

Jeremy Simons

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Comments for Planning Application 24/00236/FULL

Application Summary

Application Number: 24/00236/FULL

Address: Ground Floor Retail Unit 165 Fleet Street London EC4A 2DY

Proposal: Change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis).

Case Officer: Tony Newman

Customer Details

Name: Mrs Alice Gambato

Address: Flat 3 4-7 red lion court London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: 1. Safety

This chain already created public disturbance (stabbing) the area is not equipped with sufficient security for the type of club that they are establishing.

2. Animal welfare (rare species of nocturnal predators)

Further representations in objection to planning application 24/00236/FULL (“Tokyo Hit”)

As nearby residents, we supplement our earlier letters of objection, in light of the Applicant’s subsequent Design and Access Statement (“**DAS**”) and Management Statement submitted after the Licensing Sub-Committee’s grant of a premises licence for the development. This representation contains additional points following consultation with a planning consultant and specialist counsel.

We have appealed the licensing decision to the Magistrates Court, on the basis it breached the Corporation’s Statement of Licensing Policy that “*residents have a reasonable expectation that their sleep will not be unduly disturbed between the hours of 23.00 and 07:00*”. With the agreement of all parties, the hearing of the appeal is postponed until after the Planning Committee’s decision, given that the appeal would be rendered nugatory in the event the planning application is rejected or planning conditions are imposed to reduce the operating hours in accordance with the Policy. We have been advised that the Planning Committee’s judgement on appropriate conditions to restrict the hours of operation, if permission is granted, is entirely independent and not fettered in any way by the Licensing Sub-Committee’s previous decision.

1. PROXIMITY OF LOCAL RESIDENTS AND NATURE OF THE AREA

The DAS is misleading in saying there are “*none [residential buildings] in the very immediate vicinity of the proposed Site, the closest being on Gough Square*”. As the Applicant should know, had it either consulted residents or considered their many written representations, **our residential building at 6 Bolt Court is connected with the proposed Site by only one building** (and not as the DAS elsewhere asserts in referring to Gough Court (sic) “*is separated...by three substantial office buildings*”).

As shown in Annex 1, there are **various other residential buildings in close proximity**, namely in Johnsons Court, Red Lion Court and to the south on or off Fleet Street (including Pleydell St and Tudor St/Temple Avenue). As Mr Tony Newman, Senior Planning Officer at the Corporation said in his licensing representation dated 28 February 2024 “***There are a large number of nearby residential occupiers***”. The DAS is therefore similarly misleading in asserting that the area is a “*shopping centre with a mix of office buildings and commercial spaces*” and that “*the proposed use of the Site is anticipated to harmonise with the existing commercial and office spaces that are situated in close proximity*”.

The planning application before the Committee therefore proceeds on a factually flawed basis.

2. THE UNDISCLOSED DISPROPORTIONATE SCALE, NOT IN KEEPING WITH LOCAL CHARACTER

The DAS also fails to disclose transparently and accurately the scale and nature of the development, and accordingly its likely impact. It will fundamentally change the local character, as existing pubs and shops are much smaller with fewer customers and reasonable hours of opening. They are proportionate to the area and happily co-exist alongside residents by producing no or little evening noise.

First, the Applicant confirmed during the licensing hearing that the number of patrons would be **up to 2,500 per day, with 250** at any given time. The DAS voices the ambition that the offering “*draws clientele into the City at weekends*”. Inevitably this will include large groups, whether corporate teams (with their alcohol paid for) or stag/hen parties. This is important context for the DAS’s acknowledgment that “*it is however likely that a concentrated number of patrons will leave at the end of the evening*”.

Second, although the Fleet Street area does have some night-time economy, the existing type of use is very different from the proposed development. It comprises **much smaller traditional pubs and bars, none of which open late into the small hours**.

Third, the DAS’s portrayal of the development primarily as a mini-golf leisure centre is incomplete. The activities for which the licence has been obtained include supply of alcohol, films, live and

recorded music and late-night refreshment. Patrons would be able to attend **purely to drink alcohol or consume food, without pre-booking** or playing mini golf (or bowling). Indeed, the Applicant at the licensing hearing relied on the fact that patrons who had drunk at pubs could, at closing time, be sent onto the proposed development. The reliance on very late hours (1.30am Thursday to Saturday) exposes the truth that the venture aims to be **a very late-night bar or club**.

3. AMENITY IMPACT CONTRARY TO POLICIES

The proposal does not comply with the requirements of Local Policy DM 3.5 “Night Time Entertainment” (see Annex 2). This policy goes to the essence of the application.

- The Site has no outside space. Many of the patrons will **congregate to smoke/vape** in the covered areas of St Dunstan’s Court during their visit as well as after leaving.
- **Bolt Court is the direct pedestrian route from the Site to Farringdon Station** (the closest station for the Elizabeth, Hammersmith & Bakerloo lines).
- At present the area is **extremely quiet in the evenings** and especially Friday to Sunday.
- Bolt Court, as a small square, is an **echo chamber** in which noise is amplified.
- 6 Bolt Court is a historic grade II listed building, so modern double glazing is not possible.
- The **noise disturbance of up to 250 patrons/hr** (many of whom will have drunk alcohol) will accordingly have an unacceptable impact on amenity of residents, particularly after 11pm.

Granting planning permission would therefore be contrary to DM 3.5, as well as DM 21.3 (Annex 2).

The Corporation’s officers had similar concerns in their licensing representations, which are equally relevant to planning considerations. Claire Callan-Day, email dated 26.2.24: *“I have particular concerns as to how amplified music spill, noise associated with the bowling, **noise from patrons outside (for smoking, etc.) and dispersal noise will be controlled as there is a significant risk that if not managed robustly there will be a detrimental impact to those in the environs of the premises, in particular residents and other noise sensitive receptors.**”* Per Tony Newman, above: *“There are a large number of nearby residential occupiers...that could be negatively affected by the proposed operation **..the spilling out of large numbers of people into the surrounding streets and alleyways in the early hours of the morning when (02:00 Monday to Sunday) when there is an expectancy for local residential occupiers to be able to sleep.**”*

4. APPLICATION FAILS TO DEMONSTRATE COMPLIANCE WITH POLICES

Under the planning policies (including DM 3.5, 21.3 and London Plan Policy D13C) and caselaw, **the burden is on the Applicant to demonstrate that there will be no unacceptable impact on amenity and to establish that mitigation measures will be effective.** It has failed to do so.

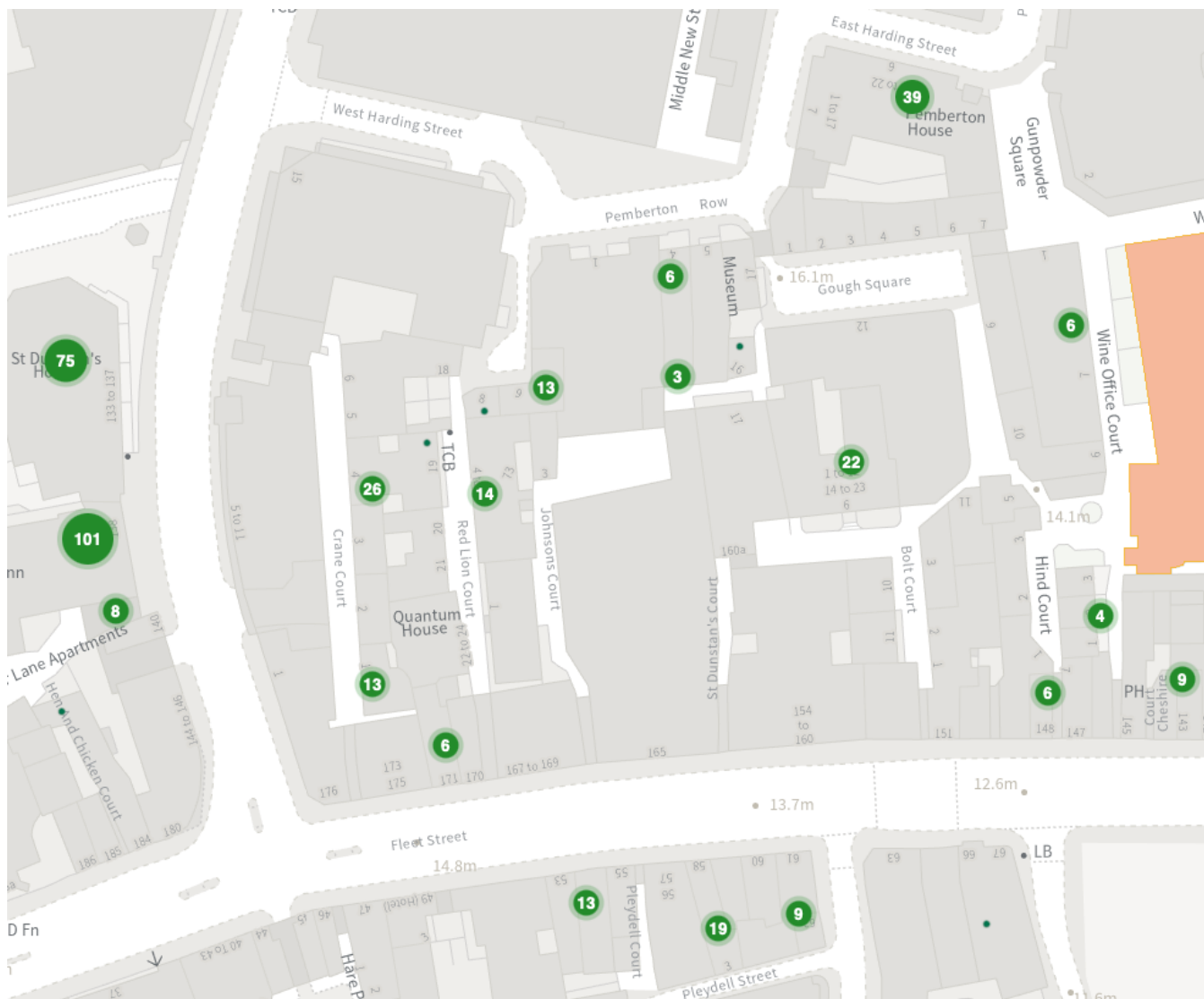
- **No noise survey has been produced.** Alleged mitigation measures are meaningless without knowing the existing background noise levels (which as stated above are very quiet). In consequence, the application fails to assess and demonstrate that the surrounding residential premises will not be adversely impacted by noise.
- The Management Statement **fails to include earlier closure hours to protect amenity as required by DM 3.3.22.** Further, the alleged measures will clearly fail to stop disruption to residents’ quiet enjoyment late at night, because once patrons have left the premises (either temporarily or finally), the **Applicant has no legal power to control patrons’ behaviour.** It is impossible to adequately eradicate noise created by patrons off the Site.
- Further, the District Surveyor’s Office (representation dated 31 May 2024) states that the proposal does **not comply with policies D5 and D12 on fire safety.**
- Contrary to DM 3.3.22, no information is provided how **cooking odours** from the noodle bar will be addressed. The plans do not disclose the location of kitchens or ventilation ducts.

In conclusion, in light of the above, we urge the Planning Committee to refuse the application. Alternatively, if permission is granted, we consider a condition restricting hours of operations to 10am until 11pm (10pm on Sunday) is necessary to reduce the impact on local residents.

Rebecca Bailey-Harris, Toby Brown, Flats 9 and 10, 6 Bolt Court, London EC4A 3DQ

ANNEX 1: PLAN SHOWING SURROUNDING RESIDENTIAL UNITS

The following plan is a screenshot from www.mapping.cityoflondon.gov.uk showing residential units surrounding the proposed site at 165 Fleet Street (which is in the lower centre of the map).



ANNEX 2: RELEVANT PLANNING POLICIES

Granting planning permission would be contrary to a number of planning policies:

Para 191 of the National Planning Policy Framework 2023 requires that planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health and living conditions. In doing so they should “(a) *mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;* b) ***identify***

and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”.

Per Local Plan (2015) DM 3.5 on night-time entertainment: “1. **Proposals for new night-time entertainment...will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:** - **the amenity of residents** and other noise-sensitive uses; - **environmental amenity**, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises....

3.3.17 *The control of night-time entertainment and licensed premises is undertaken through the operation of both planning and licensing regimes. In general, the planning regime controls the location, design and planning use of premises to protect the amenity of an area or local residents...*

3.3.22 **Planning applications for new and extended night-time entertainment** uses or for variations of planning conditions must be accompanied by a Management Statement that addresses planning amenity issues, **sets out how potential impacts on amenity will be addressed** through the design of the premises and how they will operate without causing disturbance including:

- **hours of closure to protect amenity;**
- *noise mitigation plans related to both internal and external noise, including to reduce sound transfer, such as sound-proofing, noise controls and double entry lobbies;*
- *arrangements for the storage, handling and disposal of waste;*
- *a timed programme for deliveries and collections and other servicing arrangements;*
- **measures to deal with the emission of odours; and**
- **location of ventilation ducts and plant.**

...3.3.24 **To safeguard quiet times and amenity, particularly for residents** and other noise-sensitive uses, the City Corporation will attach planning conditions or seek s106 planning obligations to ensure compliance with agreed Management Statements. **The City Corporation will normally apply conditions to limit the hours of operation where there is potential for unacceptable disturbance to local residents and others.”**

Per Local Plan (2015) Policy DM 21.3 on residential environment: “1. **The amenity of existing residents within identified residential areas will be protected by:** - **resisting other uses which would cause undue noise disturbance**, fumes and smells and vehicle or pedestrian movements likely to cause disturbance; - **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....**

3.21.15 *Where required, planning conditions will be imposed which limit the hours of operation and servicing.”*

Per London Plan (2021) Policy D13 on agent of change: “A **The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development.** Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby....C **New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.** ...E Boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed.”

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Begum, Shupi

From:
Sent: 14 March 2024 11:13
To: PLN - Comments
Subject: 3rd Party Planning Application - 24/00236/FULL

THIS IS AN EXTERNAL EMAIL

Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

Our DTS Ref: 76747
Your Ref: 24/00236/FULL

14 March 2024

Dear Sir/Madam

Re: 165, FLEET STREET, LONDON, EC4A 2DY

Waste Comments

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

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarge-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C14ec2669b5e443e48d1b08dc4417ba35%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638460115898302157%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=iDxrwjwI9Vdks9yacFQZxb1D06YfQ9nqsuKIPdHVV%2BA%3D&reserved=0>

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

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarge-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C14ec2669b5e443e48d1b08dc4417ba35%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638460115898312292%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=1qmNGexJsnG%2Bs2mHXm%2B7%2FwMHG76G%2Bq4WDA%2B2RlcPDI%3D&reserved=0>

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will

be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.affluent@thameswater.co.uk. Application forms should be completed on line via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C14ec2669b5e443e48d1b08dc4417ba35%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638460115898318255%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiv2luMzliLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=jBy0r4mxipXJ3mtzBk%2FrZmmdhaupvkXBkpc%2FkC8Li5U%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.

As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information :

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fhelp&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C14ec2669b5e443e48d1b08dc4417ba35%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638460115898322517%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiv2luMzliLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=%2BTapEMUJYjqTcWC%2FIXzmPWfCezLH5Xm6P6HERKjx%2Fcm%3D&reserved=0>

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.affluent@thameswater.co.uk. Application forms should be completed on line via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C14ec2669b5e443e48d1b08dc4417ba35%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638460115898326694%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiv2luMzliLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=bYrtvYGRG%2FTFLFq%2F1iur7MilrXcFcBn98BtlnJroE4Y%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Water Comments

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

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarge-scale-developments%2Fplanning-your-development%2Fworking-near-our->

pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C14ec2669b5e443e48d1b08dc4417ba35%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638460115898330895%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=tNLn7Q2VaW7r6BW OwfUuEa7QoNCna5tXTqtGtMKXHCQ%3D&reserved=0

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to devcon.team@thameswater.co.uk Visit us online
<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C14ec2669b5e443e48d1b08dc4417ba35%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638460115898335443%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=VGJRfYellUT4xOyD2%2BtKLehFopX3pauqfCoDiZoRj5M%3D&reserved=0> , follow us on twitter
<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C14ec2669b5e443e48d1b08dc4417ba35%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638460115898339628%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=mPpGkw65d4f0%2BM%2FGJLPDnSV6gOSxWZRQfDV007Mt9ao%3D&reserved=0> or find us on
<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fthameswater&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C14ec2669b5e443e48d1b08dc4417ba35%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638460115898343665%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=tLRQuVelNn1ZTRi7hz8Oj5ksg6Cw2G Pp23Ns1p3sqe4%3D&reserved=0>. We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or

its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person – please destroy and delete the message and any attachments from your system.

From: [REDACTED]
To: [REDACTED]
Subject: [REDACTED] - Ground Floor Retail Unit 1st Floor Street
Date: 11 July 2024 11:01 AM

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

From: Yamao, Yumai
Sent: Thursday, April 18, 2024 2:33 PM
To: Mark, Simon
Cc: Yamao, Yumai
Subject: 2400236FULL - Ground Floor Retail Unit 1st Floor Street

Hi Simon,

The waste storage and collection facilities indicated in the Design and Access Statement, April 2024, comply with our requirements. This Division will, therefore, take no objection to this application. Please note, waste stores must comply with BS7596 specifications.

Thanks

Yumai

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

From: [REDACTED]
Sent: Monday, March 11, 2024 2:54 PM
To: Yamao, Yumai; Yamao, Yumai
Subject: Planning Application Consultation: 2400236FULL

Dear Sir/Madam

Please see attached consultation for Ground Floor Retail Unit 1st Floor Street London ECA/CA 2024. [REDACTED] with your consultation ID: 011224-174

Kind Regards

Planning Administration

On behalf of

Lisa Hart
Environment Department
City of London

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk



From Ms Hazel Austin
Environmental Health Officer
Environment Department
Telephone

Date 03 April 2024
Our Ref 24/01639/NPLN
Your Ref PT_LH24/00236/FULL

Subject 165 Fleet Street London EC4A 2DY

Change of use of part ground floor and part basement floor from commercial use (Class E) to a mixed use including a noodle bar with cafe and part leisure (mini golf) at ground floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis).

This department acknowledges receipt for the above application and have the following comments and observations to make:

Fumes from Use Class E / Sui Generis affecting offices or residential:

No cooking shall take place within any Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) unit 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.

Noise and vibration from mechanical systems or other plant:

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.

Ventilation & extraction:

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

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

No music audible outside the premises:

No live or recorded music shall be played 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.

Hours of servicing:

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

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

Noise control:

(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Scheme of protective works:

Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may

be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

Noise from use Class E / Sui Generis affecting offices / non offices:

The proposed Class E / Sui Generis development sharing a party element with office / 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 existing neighbouring premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall 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.

Regards

Hazel Austin
Environmental Health Officer
Pollution Team

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

Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Environment Department

Tele phone [REDACTED]

Email [REDACTED]



Date 31 May 2024

Our Ref DS/ FS24/0023

Your Ref PT_TPN/24/00236/FULL

Subject Ground Floor Retail Unit 165 Fleet Street London EC4A 2DY

In response to your request for comments in relation to the application the District Surveyors Office has the following comments to make:

The District Surveyors Office has reviewed the design and access statement section on fire and has the following comments:

No information has been provided in relation to the following requirements of policy D12(a):
Information on passive and active safety measures; Information and data on construction products and materials.

The proposal is considered not to comply with policies D5 and D12.

From: [REDACTED]
To: [REDACTED]
Subject: FW: 165 Fleet Street (Application No. 24/00236/FULL)
Date: 17 July 2024 14:15:46
Attachments: [image001.png](#)
[image002.png](#)
[image005.png](#)

Hi Team,

Final comments from District Surveyor's.

All the best

Tony



Tony Newman
Senior Planning Officer (Enforcement)
Planning Enforcement Team

Mobile: [REDACTED] | Switchboard: 020 7606 3030
City of London | Environment Department | Guildhall | London | EC2V 7HH
www.cityoflondon.gov.uk

Please note I will be away from the office from Tuesday 30 July returning on Wednesday 21 August.



From: Pundsack, Mark [REDACTED]
Sent: Wednesday, July 17, 2024 1:47 PM
To: Newman, Tony [REDACTED]
Subject: RE: 165 Fleet Street (Application No. 24/00236/FULL)

Tony,

That is sufficient for this project. I consider the policies D5 and D12 to be met.

Regards

Mark Pundsack BEng(Hons) CEng MRICS AIFireE FStructE MIoL
Assistant District Surveyor

Registered Building Inspector

District Surveyor's Office



Environment Department
City of London Corporation

[website](#) | [LinkedIn](#)



[LABC Grand Finals Winners and Highly Commended 2023 | LABC](#)

From: Newman, Tony [redacted]
Sent: Wednesday, July 17, 2024 1:10 PM
To: Pundsack, Mark [redacted]
Subject: 165 Fleet Street (Application No. 24/00236/FULL)
Importance: High

Hi Mark,

Please see a response from the applicant in respect of fire safety.

All the best

Tony



Tony Newman
Senior Planning Officer (Enforcement)
Planning Enforcement Team

Mobile: [redacted] | Switchboard: 020 7606 3030
City of London | Environment Department | Guildhall | London | EC2V 7HH
www.cityoflondon.gov.uk

Please note I will be away from the office from Tuesday 30 July returning on Wednesday 21 August.



From: Beasley Dickson Architects [REDACTED]
Sent: Wednesday, July 17, 2024 10:43 AM
To: Newman, Tony [REDACTED]
Subject: Re: Attn: Mr David Dickson - - 165 Fleet Street (Application No. 24/00236/FULL)

THIS IS AN EXTERNAL EMAIL

Dear Tony,

With regard to the general fire safety approach.

An L2 compliant fire alarm system is proposed interlinked with the other building occupiers, and the basement currently has a sprinkler system which will be integrated into the new fire alarm system. The building benefits from multiple existing means of escape that are well spread out over the floorplan, and there are no internal rooms considered high risk. New interior finishes will predominantly be Class 1 Surface Spread of Flame with small amounts of Class 3.

The above is of course subject to landlord approval, a fire risk assessment and building control approval.

I hope this is sufficient for planning purposes.

Kind regards,

David

Beasley Dickson Architects
1st Floor, 12-20 Baron Street, London N1 9LL

[REDACTED]
- Melissa Beasley
- David Dickson
info@beasleydickson.com
www.beasleydickson.com

[REDACTED]

AJ Retrofit Award 2023 - shortlisted (Aldeburgh House)
NLA Don't Move Improve 2023 - longlisted (Gladsmuir House)
NLA Don't Move Improve 2022 - longlisted (Carmalt House)
AJ Retrofit Award 2021 - shortlisted (The Music Agency)
'New Architects 4', The Architecture Foundation, 2021 - '...the best British architectural practices established in the past 10 years.'

Young Architect of the Year [YAYA], Architect of the Year Awards 2020 - shortlisted
NLA Don't Move Improve 2021 - longlisted (Chiswick House)
NLA Don't Move Improve 2021 - longlisted (Vine House)
Sunday Times British Homes Award 2019 - shortlisted (Orchard House)
NLA Don't Move Improve 2019 - longlisted (Writers Studio)
NLA Don't Move Improve 2019 - shortlisted (Tile House)
NLA Don't Move Improve 2018 - shortlisted (The Copper Lookout)

Beasley Dickson Architects Limited, registered in England and Wales. Registration no. 08932952

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