



## Planning Applications Sub-Committee

**Date:** FRIDAY, 6 DECEMBER 2024

**Time:** 9.00 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	Aldерwoman Jennette Newman
Mary Durcan	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	Tom Sleigh
Alderman Robert Hughes-Penney	Luis Felipe Tilleria
Aldерwoman 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

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

1. **APOLOGIES**

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

3. **MINUTES**

To agree the public minutes of the Planning Applications Sub-Committee meeting held on 29 October 2024.

**For Decision**  
(Pages 5 - 44)

4. **60 GRACECHURCH STREET**

Report of the Planning & Development Director.

**For Decision**  
(Pages 45 - 528)

5. **\* VALID PLANNING APPLICATIONS RECEIVED BY THE ENVIRONMENT DEPARTMENT**

Report of the Chief Planning Officer & Development Director.

**For Information**

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

Report of the Chief Planning Officer & Development Director.

**For Information**

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

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





## PLANNING APPLICATIONS SUB-COMMITTEE

Tuesday, 29 October 2024

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Tuesday, 29 October 2024 at 10.30 am

### Present

#### Members:

Deputy Shravan Joshi MBE (Chairman)  
Graham Packham (Deputy Chairman)  
Ian Bishop-Laggett  
Michael Cassidy  
Mary Durcan  
Deputy John Edwards  
Deputy Marianne Fredericks  
Jaspreet Hodgson  
Alderwoman Elizabeth Anne King, BEM JP  
Deputy Charles Edward Lord  
Deputy Brian Mooney BEM  
Deputy Alastair Moss  
Eamonn Mullally  
Deborah Oliver  
Deputy Henry Pollard  
Alderman Simon Pryke  
Ian Seaton  
Hugh Selka  
Tom Sleigh  
Jacqui Webster

#### Officers:

Polly Dunn	- Assistant Town Clerk
Callum Southern	- Town Clerk's Department
Fleur Francis	- Comptroller and City Solicitor's Department
Rob McNicol	- Environment Department
Joanna Parker	- Environment Department
Gwyn Richards	- Environment Department
Alex Thwaites	- Environment Department
Amy Williams	- Environment Department

### 1. APOLOGIES

Apologies were received from Deputy Randall Anderson, Anthony David Fitzpatrick, Deputy John Fletcher, Alderman Robert Hughes-Penney, Natasha Lloyd-Owen, Shailendra Kumar Kantilal Umradia, and William Upton KC.

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

The Deputy Chairman made four non-pecuniary declarations in relation to Item 5, noting he was a Member of the St. Bride Foundation Friends Scheme, owned an apartment in 24 Tudor Street which was nearby a designated heritage asset, was currently a Patron of Dr Johnson's House and was, until May 2024, the Chair of the Board of the Guildhall School of Music and Drama and was still serving on the Board.

The Deputy Chairman made a non-pecuniary declaration in relation to Item 6 as he had made a submission regarding the 165 Fleet Street case at Licensing Committee, but had been cleared to participate in the discussion on the Item as he did not have a Disclosable Pecuniary Interest (DPI) and did not object to the application.

Jaspreet Hodgson declared a non-pecuniary interest as a resident of Barbican Speed House.

3. **MINUTES**

**RESOLVED** – That the public minutes of the meeting held on 10 September 2024 be agreed as a correct record.

Matters arising

A Member sought clarity over a comment from the minutes of the previous meeting regarding a retrospective application from the Deputy Chairman over whether the solution mentioned referred to the planned quarterly meetings between Planning Officers, City Surveyors and the City of London Girls School or the planning perspective of CCTV and a gate being fitted without permission or neighbourhood engagement. Officers stated that the answer to how retrospective applications would be avoided in future was that quarterly meeting had been established to discuss and review programmes of works to avoid similar events occurring. Officers also assured that they would be recommending resident engagement with any retrospective application submitted would be undertaken.

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

The Sub-Committee considered a report of the Planning and Development Director concerning 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 office building, with one ground floor retail unit, community floorspace at ground 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.

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 Moorfields was also known as Tenter House and informed the Sub-Committee that the site was bounded by City Point Plaza to the north, 21 Moorfields and New Union Street, a private road, to the south, and Moorfields to the East. The site was not located in a conservation area and is not a listed building but was located in close proximity to a number of heritage assets, including the Barbican and Golden Lane Conservation Area. It was also noted by Officers that the site was close to several residential properties, including Heron House and Willoughby House in the Barbican Estate (Grade II\* listed) and highlighted planning permission was granted in September 2020 for the demolition of the pre-existing 11-storey building and the construction of an 18-storey building for office use with ground floor retail units. The permission had been lawfully implemented and the applicant was currently undertaking demolition of the building which was due to be complete down to ground level by January 2025.

Members were presented with images of the pre-existing Tenter House at the ground level environment, as well as the current site with a view of car park access ramp looking west and the entrance to New Union Street from Moor Lane looking east. Members were also shown aerial and ground-level images of the CGI Consented Scheme which Officers reported did not contain any works to the Plaza and retained the car park ramp which undermined the quality and potential of the consented scheme. Officers then presented images of the proposed Tenter House CGI which included greening across the site with more solid structure and suggested the neighbouring of tall buildings made the site suitable for a tall building. It was reported that the development would rise to 21-storeys or roughly 95m AOD.

Members were shown the proposed site plan with extensive greening works to the Plaza within the red line boundary area with the proposed community space to the west of the site and the proposed restaurant to the east of the site. Officers noted the office entrance would now be directly accessed from City Point Plaza with fully inclusive access. Members were also shown some CGIs of City Point Plaza looking from the south and southwest, the view from Moorfields looking northwest where Officers indicated the entrance would be significantly improved by greening. The view of Moorfields looking west from the previous ramp location, and the view of New Union Street from Moorfields looking west was also shown which would be exit only as was the existing situation, with the street set to be relandscaped as a pedestrian-priority thoroughfare.

Members were shown the lower ground plan which showed the entrance to the on-sit servicing bay which was in the same location as the pre-existing and was the same size as the consented scheme. Officers drew attention to the cycle parking and end of trip facilities proposed over, and above, the consented scheme and noted it was fully London Plan compliant. Officers also confirmed that only one basement level was now proposed compared to the consented scheme which had two.

Members were shown the ground floor plan and Officers suggested the layout was considered to make best use of the site through the provision of an uplift in office floor space, complimentary retail and community space. Officers indicated the proposal would transform the Plaza into a fully inclusive, heavily green space, with the removal of stepped access across the site.

The Sub-Committee was presented with the proposed first floor plan which outlined indicative areas for creative and affordable workspace.

Members were also shown the proposed second floor plan which provided an example of a typical office floorplate and noted the floor plates had been designed to be flexible and adaptable to meet a range of occupier needs, including SMEs.

Officers presented the proposed fourteenth floor plan with a wrap-a-round terrace which was densely planted and was for use by office occupiers to support internal office functions and had been designed with wellness principles in mind and was fully accessible. The depth of the planting around the edge of the terrace was 2.5m and designed for both wind mitigation and to prevent users of the terrace being able to access the edge which was important for both suicide prevention and to minimise overlooking nearby residential properties. Officers noted the balustrade around the edge of the terrace would be 2.5m high and access would be restricted between 6:00pm and 8:00am.

Members were shown the proposed fifteenth to eighteenth floor plan.

Officers presented the proposed nineteenth floor plan to Members which showed the south facing terrace and confirmed that also had restricted access between the hours of 6:00pm and 8:00am.

The proposed roof plan was presented to the Sub-Committee and highlighted the level of greening across the site.

Members were shown detailed elevations, particularly the south elevation with the greening proposed at upper floor levels with solar shading and PV panels on the façade. Officers also highlighted that the bottom of the elevation showed the change in level different across New Union Street up to Moorfields and the proposed serving bay with an acoustic door. The east and west elevations were also presented to the Sub-Committee by Officers who drew attention to the exoskeleton grid structure and the planting with glazing sitting behind it. The east elevation was shown to Members in more details with planting and balconies as amenity for officer occupiers.

Members were informed that the two bollards at the end of New Union Street on the eastern Elevation on Moorfields were designed to stop vehicles driving down the wrong way down the one-way street and to encourage pedestrian safety.

Officers presented the interaction between Moorfields and City Point Plaza which detailed the restaurant in the entrance to the plaza which featured step-free access.

Members were informed that the sliding drum doors shown in the CGI of the office reception provided fully inclusive access compared to the consented scheme and Officers noted the lobby would be programmed for culture uses to be detailed through the Cultural Implementation Strategy. Members were also shown the context of the north, east, south and west elevations in the proposed development.

Officers explained that the development would exceed the Urban Greening Factor (UGF) target of 0.32, or 0.54 with the plaza excluded and further noted that the development would far exceed the biodiversity net gain target set out in the emerging City Plan with 4.2 biodiversity units per hectares compared to the target of 3 biodiversity units per hectares.

Members were presented with images of the indicative Plaza landscaping work that showed the possible depth of trees

The Sub-Committee were informed by Officers that the cultural offer for the scheme included artwork to New Union Street and would be designed and curated by the local community and cultural groups. The community space on the ground floor would also be available at a nominal or nil charge for community groups and the office lobby would be programmed for recitals and readings. Artwork attached to the construction hoardings would be commissioned by community collaboration and the cultural offer would contribute to the aims of Destination City and Officers suggested it would provide active ground floor uses and features of interest across the site.

Members were presented with the servicing strategy summary which showed a variety of swept path analyses for different vehicle types. Officers acknowledged some different vehicle types, including refuse vehicles, would have to reverse into the bay. However, the vast majority of vehicles would be able to turn fully within the bay. Officers also drew attention to the size of the proposed servicing bay compared to the consented scheme and suggested that both the proposed and consented servicing scheme were a drastic improvement to the current scheme. Officers explained that the pre-existing building had no controls and informed Members, subject to controls on consolidation, that a cap of daily deliveries would be in place with restricted hours, including no overnight servicing, and no reversing vehicles after 9:00pm. Officers confirmed this was to be secured through the delivery and servicing management plan.

The applicant had also tested a number of different sunlight scenarios according to the Officer presentation, including the pre-existing development, the demolished site and the proposed. The sites had also been tested with balcony and without balcony which was established in the BRE guidelines. Officers explained that the proposed building would not have a harmful material impact over and above that of the consented scheme and this had been independently verified by a third party. Members were also presented with the sun hours ground test on City Point Plaza and Officers noted that the proposed scenario was the same as being consented as none of the Plaza would see two hours of sun on 21 March. To supplement that, the applicant had also undertaken transient

overshadowing and tested the plaza on 21 June and 21 September. Officers noted there was a marginal difference on 21 June between the consented and the proposed scheme. Officers informed the Sub-Committee that the proposed scenario would continue to meet the BRE guidelines and would also meet the wind microclimate and thermal comfort guidelines with the development suitable for its intended uses.

Members were shown a view of the development from Gabriel's Wharf and Officers assured that none of the strategic views identified in the London View Management Framework would be affected. Local views of St Paul's Cathedral from the South Bank showed the proposal was fleetingly visible, seen briefly for 19m out of a total of 1.9km. The height of the proposals were reduced from that originally submitted to minimise the impact with greening added to the upper floors to soften visibility. Officers noted that as tall buildings could be viewed from the South Bank behind St Paul's Cathedral, the development was broadly consistent with the wider character of the kinetic viewing experience. However, Officers did consider that the proposal would result in a slight level of less than substantial harm to the setting of St Paul's Cathedral from the South Bank viewpoint. Historic England had not objected in principle to the proposals which reflected the fleeting nature of the impact.

A day and night view of the development from Gabriel's Wharf was shown to the Sub-Committee by Officers, as well as a slightly different local viewpoint further to the east than the previous view where existing buildings could be seen behind the north-west tower and pediment of St Paul's, with the proposed scheme barely visible.

The view from Willoughby high walk looking east was shown to Members with the consented and proposed scheme with 21 Moorfields in the background and Officers assured no harm would be caused to the Barbican as a designated heritage asset.

Officers presented the lighting impact assessment with the proposed façade and public realm lighting and noted it would be subtle and provide opportunities for passive surveillance and highlighting important details from the façade whilst minimising potential nuisance from light spill. Officers also explained that a full lighting strategy would be secured by condition and would include curfew hours for office lighting.

Officers indicated the building would have excellent sustainability credentials and the scheme was designed to facilitate a future connection to Citigen with a Breeam 'Outstanding' and Nabers 5\* rating were targeted. Members were also informed that the building would be fully electric with a diverse power supply to the grid and the scheme would far exceed the policy targets for the urban greening factor and the biodiversity net gain.

It was concluded by Officers that the scheme represented a high-quality transformation of the site and key public open space next to an important transport hub. It was also considered to be acceptable in height and massing, particularly in the context of the neighbouring tall buildings and its townscape

context and suggested there would be no impact on London-wide strategic views. Officers accepted there would be a degree of less than substantial harm caused to the significant of St Paul's Cathedral in local views from South Bank. However, these would be fleeting in nature and the height of the building had been reduced in the proposal to respond to the view and was now considered acceptable on balance. The architecture of the proposals was sought to bring together the fragmented quality of the plaza through a restrained ordered façade design that promoted a tactile and green character. Officers also maintained that the façade significantly improved the ground floor experience over that of the consented scheme as it added to the variety of active and inclusively accessible uses across the ground floor. The architecture also celebrated its timber construction details and provided a warmer, and approachable, character over and above the corporate appearance of the consented highly glazed scheme. Officers affirmed that the scheme would deliver over 33,000m<sup>2</sup> of Grade A office floor space and would accommodate over an estimated 18,880 jobs in a well-connected area. The office use on site would be complimented by the proposed restaurant and café, community uses and cultural programming of the lobby and the community and lobby space, along with the new artwork on New Union Street, would deliver on the aspirations of the City of London's Destination City initiative. Officers explained that the provision of a drastically enhanced fully inclusive public realm was a significant benefit of the scheme, providing dense greening and a reinvigorated City Point Plaza with good microclimatic conditions and contributed to the urban greening and biodiversity net gain that exceeded policy aspirations.

Officers reiterated to the Sub-Committee that the scheme was acceptable in transport and highways terms, subject to conditions and Section 106 obligations and the amenity aspects of the scheme on local residents had been rigorously assessed and independently reviewed and, subject to recommended conditions, were acceptable. It was acknowledged that the scheme would result in some degree of minor harm to St Paul's Cathedral in localised, fleeting, viewpoints, but no harm to any other heritage assets had been identified and the scheme was considered to be of high quality, well considered and very substantially compliant with local plan policies and exceed some policy aspirations.

Officers confirmed that the proposed development was recommended to the sub-committee for approval.

The Town Clerk explained that there was one registered objector to address the meeting and he invited the objector to speak after he had confirmed the speaking procedure with the objector.

Ms. Helen Kay stated it was an improvement of the existing scheme and explained the decision before the sub-committee would be life-changing for many people. Ms. Kay highlighted that the recommendation to approve the development application had received over 100 objections which took up 177 pages of the agenda pack for the meeting. Ms. Kay drew attention to resident frustration and upset and indicated that the issues that had been objected to could have been dealt with at the pre-planning stage. Ms. Kay suggested that, on occasions, she felt residents had received bad press but felt that residents wanted a thriving business community and a sustainable city as much as those

who supported the development and noted that residents brought up their families in the City, volunteered there and contributed to its success. Ms. Kay recommended a number of conditions, including the restriction on the hours terraces could be operational, which Ms. Kay acknowledged Officers confirmed would be included.

Ms. Kay also recommended a condition to fit automatic blinds to the windows due to the detrimental effects of light spillage on the 210 bedrooms in the Barbican near the development, citing the London Plan. Ms. Kay suggested that architects would claim there was PIR lighting in the building, but felt this could be overridden and left on over holiday periods. Ms. Kay noted the fitted blinds at London Wall Place made a huge difference and hoped that Deutsche Bank would do the same at 21 Moorfields, but felt it was wrong that residents had to initiate negotiations.

Ms. Kay recommended a third condition to make the service yard big enough for larger lorries to turn around as the high-pitched beeping that resulted from reversing was a noise nuisance. It was suggested that white noise was in the City of London's planning guidelines, but it was not mandatory and was ignored. Ms. Kay suggested that architects would claim the entrance for servicing was too narrow due to the core, but argued that 21 Moorfields had a similar issue and was a design issue. She suggested a design change now would save twenty years of disturbance.

Ms. Kay suggested the addition of another condition for observance of guidelines on the cumulative effect of loss of light as the London Plan stated that access to daylight and sunlight was crucial for the mental health of residents and workers. Ms. Kay raised concerns there were consequences of the extension of the development from 18 floors to 21 as it would require more servicing and there would be more loss of light. Ms. Kay

Ms. Kay stated that the daylight, sunshine and overshadowing analysis did not show the cumulative impact of Tenter House and 21 Moorfields and suggested it should. She further stated that formal requests had been made for it on 24 April and no response had been received other than the response to the representation made in the report that dismissed the comment which would block the only daylight gap between City Point and 21 Moorfields.

Ms. Kay recommended a fifth condition that all traffic flow from Moorfields rather than Moor Lane as mentioned in the report and made reference to a long-awaited plan for a green garden style street for Moor Lane which was paid for thirteen years ago by S106 by the Heron. She also stated that Moor Lane was part of the neighbourhood healthy streets plan and assured that servicing and deliveries would be booked in advance which would add more traffic to a narrow, and quiet, greened street.

The Chairman asked if Members of the Sub-Committee had any questions of the objector. A Member queried if there was a way to track discussions that had been had between the developers and residents to see how dialogue had broken down between the two parties. The objector explained that developers would consult



during the pre-planning stage, so issues, such as those raised with the service yard, should be discussed at that stage. The Member followed up and considered whether the objector had discussed the issues raised with the developer face-to-face. The Objector confirmed they had.

One Member asked the Objector for examples of what noise and light pollution would mean to residents affected and considered the delay of the greening in Moor Lane and what implications that would have for long-term residents and those committed to the area. The Objector explained those who lived opposite the developments would be affected by the lights being left on all night and all weekend, often with no one in the offices and the use of blinds and curtains would have to be used. The Objector explained that as it was getting dark earlier in the winter months, there would be a glare into homes and would be made much easier by blinds being fitted in office spaces. The Objector also noted that they were woken up early in the morning by reversing lorries. In consideration of the greening of Moor Lane, the Objector indicated money had been received from the Heron development through Section 106 monies and Moor Lane was currently on its sixth development and the Objector had patiently waited for each one to be finished. The Objector stated it was part of the Neighbourhood Healthy Street Plan and a small group was going to be established in December 2024 to write the scope for the greening of Moor Lane. A Member indicated to Officers it would be helpful to have the plan for the greening of Moor Lane going forward.

A Member asked what impact the 41 service deliveries a day would have on the Moor Lane greening scheme. The Objector indicated it would be significant as it was a narrow street, as well as the noise and fumes they create, and indicated there was no reason for vehicles to drive into Moor Lane when Moorfields was an option.

The Chairman invited supporters of the application to speak. The Town Clerk explained that there were two registered supporters to address the meeting and he invited the supporters to speak after he had confirmed the speaking procedure and outlined they had five minutes each.

Mr. Andrew Thomas, commercial manager at Metropolitan Properties City Ltd. (part of the Freshwater Group) addressed the Sub-Committee and thanked Officers for the recommendation to approve the application, as well as residents and Members who attended an exhibition or commented on the development plans by other means. Mr. Thomas stated that Freshwater was a family-owned with a commitment to providing ensuring benefits for their tenants and local communities, and had a track record of new build and refurbishments in Central London, including office schemes in Finsbury Square, Worship Street, Kingsway and Cavendish Square.

Mr. Thomas stated that Highdorn had owned Tenter House for thirty-five years and were excited to deliver a high-quality sustainable building for the next phase of the site's life. Mr. Thomas explained that the opportunity to redevelop Tenter House would provide more than the highest quality office space and contribute toward a harmonious relationship between the surrounding buildings and would offer valuable enhancements to the public realm within City Point Plaza.

Mr. Thomas stated that the previous permission was pursued with an aspiration for a revised scheme that resolved inherent problems with the Plaza. The aspiration was supported, in principle, by Officers at the time of the 2020 permission. However, there was no guarantee that the revised Plaza design could be achieved due to a complex ownership structure. As a result, the consented and implemented scheme was pursued. Mr. Thomas noted that, throughout, they had been exploring aspirations for the Plaza through intensive and protracted legal discussions with neighbours to get to a point where the developer was able to incorporate the Plaza as part of the new scheme. It was also stated by Mr. Thomas that the developer had taken the opportunity to respond to changes in the development plan policy and deliver a best-in-class office building.

Mr. Thomas informed the Sub-Committee that, if the application were approved, the programme would deliver the completed Plaza improvements by November 2025 and the completed building by the end of 2028. Therefore, the current Tenter House building was being demolished in accordance with the implemented planning permission to ensure the scheme was delivered in those timescales.

It was noted by Mr. Thomas that, following further engagement with the City of London Corporation, neighbouring landowners and resident suggestions for improvements had been made to his plans. This included a reduction in building height, additional greenery, greater energy efficiency and access to community space. Mr. Thomas believed, as a result of the changes, that the scheme had evolved for the better and would make a positive contribution to the City.

Mr. Guy Bransby, of Montagu Evans, stated that planning permission for the redevelopment of the site was granted in 2020 which had technically been implemented and continued to be undertaken on the site. However, the design had been revised to deliver a scheme that met current and future tenant requirements following changes to way employees worked post-Covid and new regulatory requirements on sustainability, fire and Disability Discrimination Act (DDA) access. The new scheme accorded, and in some cases exceeded, the strategic London Plan and City Plan policies to maintain the City's position as the world's leading international financial and business centre.

Mr. Bransby stated to the Sub-Committee that the new scheme made optimal use of the site by providing a greater quantum of Grade A office-floor space in a highly sustainable location and addressed the Corporation's Destination City objectives which the extant permission did not. The new scheme provided the means to deliver the regeneration of the Plaza, costed at £5m, which would create a significantly more accessible, equitable and safer environment for visitors and workers in the City.

Other benefits noted by Mr. Bransby included a ground floor retail unit to contribute to the vibrancy and link to the nearby principal shopping centre at Moorgate, along with a standalone community use for the public to create a healthy and inclusive City to accord with City Plan policy S1 in particular. It would

be on the ground floor to ensure a high level of accessibility, and its operation would be secured by the community use management plan linked to the cultural strategy all bound by the Section 106 agreement.

It was assured by Mr. Bransby that the developers would proactively engage and consult with local residents to develop ideas on to use the space exclusively for them. The provision of creative workspace within the building, public art at New Union Street and uses of the construction hoardings would link to Destination City. He noted there was an estimated amount of £10.5m of CIL monies and £3.5m of Section 106 contributions, which was approximately £9.5m more than the extant scheme.

Mr. Bransby stated that the development had exemplar biodiversity net gain sustainability credentials which included targeting a Breeam 'Outstanding' rating and the new building would be sustainable in its heating and power usage. All concrete removed from the building would be recycled. He also noted that the number of consolidated deliveries was around 41 per day and the majority of deliveries would be vans which were able to turn around in the entirety in the Loading Bay through a much more efficient design compared to the extant scheme. Around 10% would involve reversal onto New Union Street, but, as requested by the objector, white noise would be employed to smother the reversing beeps. In addition, a condition of no reversing after 9:00pm had been agreed which did not form part of the extant permission. Mr. Bransby noted that no such controls, or any controls on delivery or servicing, were in place for the pre-existing building.

It was specified by Mr. Bransby that a condition had been agreed, with regard to the terrace on the 14<sup>th</sup> floor, to prevent access after 6:00pm on weekdays and no access at weekends. No audible music had also been agreed at any time and access would only be available to tenants of the building. A 2.5m high glass screen with extensive planting behind it to act as a noise barrier and to prevent access to the terrace boundaries. Mr. Bransby noted that the residents of Willoughby House were approximately 70m away from the development's closest façade. However, he was able to confirm that the applicant was happy to commit to a condition on blinds on the western elevation.

Mr. Bransby explained that extensive consultation had taken place in line with the Corporation's updated statement of community involvement and had hosted an exhibition on site on 28 November during the pre-application period which had forty attendees. Regular meetings had also been held with adjoining landowners and Barbican residents throughout the process, including during the pre-application period, which resulted in enhancements to the scheme. This included improved screening and revised landscaping on the 14<sup>th</sup> floor terrace to prevent overlooking, additional testing of daylight and sunlight, improved energy efficiency and sustainability features and improved landscaping and additional greening on the building. More recently, a reduction of 5m to the height and 1000m<sup>2</sup> less floor space, along with the move of the community space to the ground floor, had also been accepted and Mr. Bransby indicated the developer was committed to continuing the engagement with the local community post-planning.

The Chairman asked if Members of the Sub-Committee had any questions of those who spoke in support of the application. A Member asked for assurance that a standalone community space, as set out in the development documents, would be delivered and not be diluted by other uses. The Member also asked if developers would commit to proactively engage and consult with local residents in development ideas on the space so it addressed resident needs and aspirations. A supporter of the development indicated assurance could be given.

A Member indicated they would like to see a much more robust social value framework for community space in the public realm as they did not think the development necessarily did that and were concerned that the community space, if built without the framework, could be underused and underrepresented. If a space was developed without a clear use, infrastructure funding would have to be found, and hard work would have to be carried out as a community to collaborate and bring partnership in to use that space. A supporter indicated the plan was to work with the community and with City Officers in conjunction with the cultural strategy and the proposed condition on the planning permission to develop a robust programming plan for the public space.

A Member asked for an explanation of what the differences were, of the vehicle movement aspect of servicing, between the existing scheme, the consented scheme and the proposed scheme. A supporter stated that with the current pre-existing building, the servicing yard was in approximate the same position as it was now. It was accessed from New Union Street, the arrival and departure sequence was the same, with vehicles arriving from Moor Lane from the west before they would pass one-way along New Union Street into the service yard. They would then exit to the east on New Union Street onto Moorfields and head north.

The supporter indicated there was no change to the vehicle routing proposed from the pre-existing scheme to the consented. The latest proposed scheme made a significant change as there were no servicing controls in place previously and there was no consolidation. There was also no cap on the number of deliveries and there was no restriction on the times in which servicing could be undertaken.

The supporter further stated that the consented scheme drastically improved and overhauled the servicing yard to provide for vehicles to turn within for it rather than reverse in with no restriction. While there was still an element of reversing in for around four or five deliveries a day, that was around 10% of the overall number of deliveries. A cap on the number of deliveries was also introduced for the consented scheme of 41 deliveries and had remained the same for the latest proposal.

The supporter stated that the difference with the proposed scheme was there was around double the amount of office floor space from the pre-existing building and yet the number of deliveries had been kept to a very similar level. Servicing hours had also been added that were off-peak and there would be no reversing late at night. He indicated this worked well with the aspiration to increase

pedestrian movement on New Union Street which would occur at times when deliveries were prohibited. The supporter noted the width of the loading bay had been increased with the new proposal and, from an architectural perspective, had gone from two basements to one which was a positive in terms of the embodied carbon and also meant that the developer had done well to retain the service yard and improve it slightly while having one less floor of basement at the same time. The supporter also stated that cycle parking had been increased significantly in line with the London Plan.

A Member recommended supporters engaged with public art experts at Guildhall or visual artists team at the Barbican Centre. A supporter stated it was the plan of the developer to work with the Barbican Centre and other major cultural providers in the area to develop the public art response in conjunction with the City's own public art experts.

A Member asked why the loading bay could not be designed to be large enough to allow vehicles to turn around within it. A supporter stated that the improved scheme was the best solution as it would allow the vast majority of vehicles to turn within the servicing yard and there would only be a small amount of reversing manoeuvres which had been mitigated in a number of ways. The number of basements had also been reduced from two to one which had considerably reduced the amount of space which had been done for increased cycle parking of around 150 spaces and the end-of-trip facility. A lot more had needed to be accommodated in less basement space and yet the servicing benefit of the scheme had not been diminished and various controls to try to limit the number of reverse manoeuvres.

A Member asked why access had to be via Moor Lane and not Moorfields. A supporter stated that all three schemes had proposed a one-way system from west to east along New Union Street as it worked well and reflected the narrow nature of the private road and noted the applicant only had part control of the road and it was not in the applicant's gift to reverse the circulation of the road. The supporter indicated it worked for pedestrians as it was much simpler and less confusing than having two-way vehicle movements.

A Member stated that once the building was operational, the applicant would have no control over the number of vehicles that could carry out deliveries and considered whether a condition could be added on restricting reversing before a certain time to ensure it was not done in the early morning. Mr. Steele noted there were draft conditions for the timing of service deliveries that would prohibit off-peak servicing, part of which included no servicing in the early morning, as well as late night which the condition defined as being between 7:00am and 10:00am, a restriction in place from 4:00-7:00pm, followed by a restriction preventing reversing from 9:00pm onwards. He stated that the detail was set out in the Section 106 agreement which was already in place for the consented scheme and anticipated there would be another that would set out the cap on deliveries. Mr. Steele also stated that there could be a discussion around the proportion of HGVs with the City regarding what would go in a Section 106 agreement and suggested that the HGV element was largely a function of the consolidation that ultimately brought down the number of deliveries as slightly larger vehicles were

needed to consolidate goods; the four to five vehicles that would be likely would be the consolidated vehicles.

A Member asked why a proposal was put forward if there was already awareness that the height of the development would potentially damage the strategic view of St. Paul's Cathedral. Ms. Lois Wheller (Tavernor Consultancy) stated they had been advising on the townscape and heritage and there was no impact of any strategic views. There were two views across the site, one from Westminster pier where there was no visibility in that view and two viewpoints from Gabriel's Wharf where there was also no visibility of the development. Ms. Wheller stated that what came to light later in the development of the scheme was a slightly degree of visibility when one moved away from the strategic viewpoint and the height of the scheme had been lowered to address the small degree of visibility. She also noted that once one moved away from the 16B viewing area in the LVMF, other buildings came into view behind St. Paul's Cathedral. It was a very small degree of fleeting visibility of which the developers had reduced the impact so as not to affect the legibility of the Cathedral and had arrived at the view, as a result, that there was no harm to the significant of St. Paul's Cathedral in that sequence. Ms. Wheller noted that Officers found a small degree of harm in the report but had balanced that against the public benefits and the developers had consulted with Historic England who had not objected to the degree of visibility.

A Member asked what assurances the applicant could provide to ensure that trees were built on Moor Lane as similar assurances had been made in the past on other developments and had not come to fruition. Mr. Bransby d the application did not include Moor Lane and did not have any impact on greening on Moor Lane.

A Member expressed concerns about resident engagement given the application had garnered over 100 objections and considered whether objectors and applicants had worked closely enough together to resolve issues before the application came to the Sub-Committee. Mr. Bransby stated that he felt that the developers had engaged well with the residents, as had the residents with the developers, and indicated it had been a useful process as borne out by the amendments made to the scheme and commitments made at the meeting to address the concerns of objectors. He also stated that the need for a second round of consultation due to the scheme being revised, as well as the high-profile nature of the development, may have been factors in the number of objections.

A Member was encouraged a community space would be included in a development of its size but questioned whether toilets would be available in the space and whether they would be available for public use. Mr. Bransby stated the community space did contain a toilet and the applicant's view was that the space was to be managed by whichever operator managed the space on behalf of the local community. It would be up to them as to how they provided public access to the toilet, but the developer was happy for access to be given to the public to use the toilet in the community space. He also noted there were community toilets nearby.

A Member asked whether assurance could be given that the lights would not be left on all night. Mr. David Walker (David Walker Architects) stated that low intensity lights had been incorporated and there was a detailed lighting report which supported that. He also noted that, given the coffered nature of the ceiling where the timber beams sat below the position of the light, that would further benefit the shading of the fittings from the exterior.

A Member stated there used to be an issue with flooding outside Tenter House every time it rained and considered whether that had been resolved. Mr. Bransby stated he was not aware of a flooding issue, having checked with the client, the project manager and the architect.

A Member asked why an application did not come to Sub-Committee without the demolition with an opportunity to retrofit given City policy. Mr Bransby noted the extant permission did not demolish the whole site as there was a prep unit that was not included in previous scheme but formed part of the current scheme. He also stated that pre-application discussions had taken place with Officers to establish whether the developers were on comfortable ground with the position not to do extensive optioneering and option testing.

A Member stated there was an opportunity to make the community space successful through an ongoing commitment financially to the space for it to continue to run. Mr. Bransby stated the applicants were committed to the space and bound by obligations Officers were delegated to include in the Section 106 agreement.

A Member stated the greening of the Plaza was notoriously difficult and trees were failing there already and was interested to hear about the ongoing commitment to working with the City to find solutions that would work to avoid more dying trees. Mr. Bransby stated he was aware of the issue of planting taking hold in the Plaza and was committed to getting the planting, the species and the maintenance programme right through appropriate conditions and obligations.

A Member stated that white noise blockers were notoriously unreliable and was interested to hear what innovative solutions developers may have to address the problem of noise. Mr. Bransby stated his team were committed to addressing the issue, having had attention drawn to it by residents and other schemes, and were committed to working with Officers to address it.

A Member stated that while the applicant had agreed to include blinds to address lighting, it did not address issues with climate change of reducing the fact that 26% of the energy consumed in the City were lights and questioned Officers on whether the lighting strategy would apply to the applicant should the application be approved and whether those lighting conditions would ensure the PIR system was not switched off and lights would not stay on all night behind a blind. Officers agreed that the two issues of blinds and the lighting itself were not mutually exclusive and confirmed that the lighting strategy still required all the sustainability elements around PIRs. If Members considered it necessary to attach a condition on blinds, that would sit alongside the existing condition regarding the lighting strategy.

Officers drew attention to Condition 26 in the Agenda Pack and confirmed that the justification of the Condition was related to environmental reasons.

A Member queried whether there was any technical or planning reason as to why there was some reluctance from the Applicant to a condition which would ensure that deliveries had to arrive via Moorfields rather than Moor Lane. Officers stated that it could not be dealt with by condition as it would require a redesign of the entire layout.

A Member asked what conditions could be implemented to address objectors concerns about deliveries flowing down a residential street. Officers stated that it was addressed by the conditions laid out regarding the consolidation of the hours of use and the limit of deliveries, as well as the Section 106 agreement.

It was queried by a Member as to whether it was correct that Moor Lane was used by Centre Point and, even if the application were amended, Centre Point would still have vehicles delivering via Moor Lane. Officers stated that New Union Street was not under the applicant's control to make changes to and, with regard to servicing, the number of deliveries was now restricted to 41. In addition, Officers had asked for a booking system for all servicing to be implemented.

It was stated by a Member that other local authorities were removing heavy traffic from residential streets and felt the opposite was being done with the application. The Member also suggested that with the impact of numerous developments, a solution should be investigated in detail and, if it was possible, a condition should be attached to address the issue of heavy traffic on residential streets.

A question was raised by a Member on how the servicing would operate, especially as there was only one enforcement officer who only had so much capacity to ensure only 41 deliveries were made and considered how many deliveries would be made an hour. The Member also suggested that the servicing area needed to be enlarged as they were concerned it was not large enough to take 41 deliveries a day and the impact this would have on surrounding streets. Officers estimated there would be 21 four and a half ton and 5 seven and a half ton lorries a day and explained it was not feasible to change New Union Street as it was a private road, there was not enough space to widen the carriageway and, if vehicles came via Moorfields, New Union Street would have to be changed to ensure it flowed westbound rather than eastbound. Officers stated that was not feasible as traffic would have to be controlled at the junction and a traffic survey had been carried out that estimated around 1,500 vehicles used Moor Lane daily. Officers stated that they did not feel the addition of 41 more trips would impact upon the operation of Moor Lane and residents.

It was noted by a Member that there was an issue of noise pollution on Moor Lane from taxis and deliveries being dropped off and questioned whether it was possible to make use of double red lines and remove use of the road by pick up and drop off taxis as the Silk Street entrance and other areas could be used instead. Officers stated that it was within the gift of the Corporation to add such restrictions as there were no waiting or loading restrictions currently in force.



A Member stated that, if it was impossible to change the route, whether the application of double red lines and the removal of taxis could be done, especially as there was an option on Silk Street to do that. Officers indicated that it was within

One Member asked why Officers had not pushed for a larger servicing area as part of the planning process to ensure the building was future proof for servicing without impacting upon the surrounding street. Officers stated the consented scheme of 2020 had the same loading bay and there would be five in-and-out movements during the day which, in theory, meant there would only be three deliveries. Alongside the capping of deliveries and types of vehicles used, as well as the booking system, it was felt not to be feasible to expand the space for three deliveries.

The Member noted this was a new application and asked why a larger service area had not been included in the new scheme, particularly as the developer had revised the scheme previously in reaction to market forces.

The Chairman asked for an explanation of the logic behind the solution before the Sub-Committee as opposed to other options and requested that the context of healthy streets plans for the area be discussed. Officers stated that the reduction in the number of basement levels within the proposed development meant the ground floor and basement areas were working harder to make use of the space, especially as more space had been used for a significantly enlarged cycle parking area. Ultimately, Officers considered the scheme acceptable as it was a reduction from the pre-existing position and comparable to the approved scheme, as well as the restriction of the minimum number of vehicles which was felt was well-separated from Moor Lane as vehicles would be on a private road.

A Member asked for an explanation of why it was not technically feasible to have access to the service bay from Moorfields and queried why the building could be redesigned for cycle parking for those who worked in the office, but not for the service bay for residential amenity. Officers stated it was not in the gift of the applicant to allow for a two-way as the road in question was a private road and redesign of the service bay would have known on affects on Moorfields that were unknown. The Healthy Streets assessment being done across the wider area was looking at various proposals for Moor Lane and Moorfields, but Officers indicated that City Operations colleagues had not informed them that the proposal conflicted with any of the proposals shortlisted at the moment.

The Member also asked what could be done to identify who owned the private road. Officers stated that Brookfield owned City Point and the Plaza around that. They had also received representations from residents and met with the Barbican Association directly on that point.

A Member stated that the report set out the position of the City as a local planning authority and was a relevant factor in relation to the basement and considered why Moorfields was being discussed as Liverpool Street Station had 65 million passenger movements and 14,000 National Rail movements. They noted the

impact on residential amenity and asked what statistics were available on that and why that, ultimately, did not factor into the final Officer decision. Officers noted the consented scheme was given planning permission and demolition was due to be completed by January and the applicants had indicated that, if the scheme before the sub-committee was not approved, they would continue to implement the previously approved scheme. Therefore, it was a material consideration. Officers stated that the wider implications of changing the scheme to two-way and in-and-out via Moorfields could have significant impact on pedestrian flows.

A Member asked Officers to confirm that the 100 objections received ultimately had no bearing on the Officer conclusion. Officers confirmed that was the case, every objection had been scrutinised, efforts had been undertaken to address the issues raised and the scheme before the Sub-Committee did actually address the issues and was considered to be recommended positively.

Another Member queried whether the mitigation of extra traffic flow was looked at in the surrounding area when major projects came before the Sub-Committee as calming measures were previously enforced at Moor Lane and Fore Street and questioned what had changed that was done around 10 to 15 years ago. Officers stated that no additional calming measures were required at Moor Lane and there was a Healthy Streets Plan that was looking at traffic measures, calming measures and greening along Moor Lane and Moorfields and which was designed to improve the pedestrian and cyclist active travel environment. As a result of the proposal in the application, it would not result in any increase in vehicle movements and, therefore, no direct on-street requirements were needed.

**MOTION:** A Member proposed that whilst the Committee is supportive in principle of the application, consideration be deferred to allow further discussion between Officers, the applicant and residential neighbours on the issue of servicing and deliveries.

The Chairman asked if there was a seconder and a Member agreed to second the proposed Motion.

In response to further Member questions, the Chairman confirmed that Members were debating the Motion and not the full application.

The Deputy Chairman indicated he would oppose the Motion as it was not necessary as the previous building had used Moor Lane without problems, it was also a lightly used road and would have a huge impact if Moorfields was used as the access point. The Deputy Chairman also believe the Sub-Committee should not get into the habit of deferring applications.

A Member stated that the applicants had made a number of concessions and there were zero controls over the consented scheme already approved, this scheme had restricted to around four movements a day down a private road and was not sure what the issue with the application was and felt the debating would

lead to a wholesale redesign of the building which was not appropriate or proportionate to the circumstances.

The Chairman stated that if there was a technical reason the Sub-Committee thought the applicant had not considered an option, or if there was a fault in the logic applied, he might have supported a motion. However, he could not see that in the report. He saw a Healthy Streets Plan that supported the current servicing option and the footfall demanded that the Sub-Committee did not make Moorfields two-way.

It was stated by another Member that the Healthy Streets Plan had not been implemented in a decade and had been told the Plan was outside the scope and could not be applied to support an application and noted, in reference to the private street, that it was not in the middle of nowhere and families were sleeping in the area, and they heard the noise from the street.

A Member, who made a point of personal explanation, stated he specifically acknowledged residential amenity and asked the other Member to withdraw his comment that he suggested it was in the middle of nowhere.

The Member stated he intended to cause no offence but reiterated the need to consider the people element of the application.

It was stated by another Member that there had been significant concessions, particularly around blinds, and while they understood the spirit of the proposal, they would not be supporting it as they suggested developers were being asked to defy the laws of physics and it would prolong that discussion longer than necessary. He also stated it would not be good discipline to continue to defer items.

A Member indicated they would support the Motion and fully appreciated there was another application they could implement but believed the developers had come forward with a redesign as it would be beneficial for them and their partners. They also stated that a harmonious relationship with neighbours was needed and future proofing the servicing of the site was beneficial to the developer in the long term and the tenants. The Member noted that if streets did not function effectively, it would lead to pollution and clogged up streets which would impact upon business. They also stated that previous applications had been deferred and had returned to the Sub-Committee within months and believed that it provided space for City Planners and developers to revisit and review applications.

A Member stated they agreed with the need to avoid deferring applications but felt that sending traffic in and out of Moorfields had not been looked at and felt it had not been explained why it was impossible other than a reference to New Union Street being a private road. The Member noted that deferring the application would not have been considered had they felt they had received an explanation that made sense. While the Member appreciated all the constraints that had already been put in place, they felt reversing lorries would not help New Union Street an art filled street with an up ramp and down ramp or make it safer,

even with restricted hours. The Member stated that if it is impossible to provide access from Moorfields and if that could be demonstrated to the Sub-Committee, that would answer that question. The Member indicated they would support the Motion.

The proposer of the motion stated they were entirely in support of the project as they felt it was a well-designed building and would be a great addition to that area of the City. However, there were concerns that had been raised by residents, who lived near the development, around servicing and deliveries and other Members had noted other applications had been deferred where concerns were raised where developers were able to find a solution quickly. The proposer suggested the Sub-Committee moved to the vote.

Having debated the Motion, Members proceeded to a vote:

Votes were cast as follows: IN FAVOUR – 8  
AGAINST – 11  
ABSTENTIONS – 0

The motion to defer the application was therefore not carried.

The Chairman moved the debate back to the substantive item.

A Member asked Officers whether it was acceptable that there was, according to Officers, a slight erosion in the strategic site lines for St. Paul's Cathedral as they thought there was strategic protection of views of the Cathedral and suggested proposals should come forward to the Sub-Committee that had slight erosions to viewpoints. The Chairman clarified the item was at the debate stage.

Votes were cast as follows: IN FAVOUR – 14  
AGAINST – 4  
ABSTENTIONS – 1

The Sub Committee - **RESOLVED –**

(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.

*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.*

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

The Sub-Committee considered a report of the Planning and Development Director concerning the partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) which comprised of 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 culture uses (learning and non-residential institution uses, (Use Class F1); provision of commercial uses which included retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works were included to the passageway and the Courtyard; hard and soft landscaping; and associated works.

Members were presented with the site location and heritage context with a red outline of the development site location flanked by Bouverie Street and Whitefriars Street with Fleet Street to the north. The blue outline which faced Fleet Street was the Grade Two-listed Tipperary Pub and the blue outlined which faced south onto Ashentree Court was Whitefriars' Crypt which was also Grade Two-listed.

Members were shown a visual of the north block to Fleet Street and the South block to Whitefriars Street and Bouverie Street which demonstrated that the site was surrounded by conservation areas, listed buildings and the Inner Temple Garden. The northern part of the development was in the Fleet Street Conservation Area and Officers confirmed it was a site of two buildings, with the north block called fronting Fleet Street and the southern block known as being to the south. Officers stated that the southern block was much higher and was a postmodernist building from the 1980s. The northern block was a collection of the Tipperary Pub which was a white, slender, block bookended on either side by non-designated heritage assets from the 1920s. The centre was more of a postmodernist building that was in the area of the conservation area.

Members were presented with images of the 65 Fleet Street gated and stepped courtyard and atrium interior and informed the Sub-Committee that the Applicant had re-opened the temporary pub, inserted a florist and a café and enlivened temporarily the courtyard route through. Officers stated that the courtyard was in a dismal state and areas of the routes were gated; the atrium would be repurposed and was an opportunity for retrofit.

Members were informed, while being presented with the retrofit approach, that a retrofit first policy was being followed and 100% of the substructure, below ground, would be retained of the north and south block and 93% of the superstructure, above ground, would be retained for the north block and 94% for the south block. With regard to the extensions proposed in the north block, one floor would be removed and three floors put back in with a net gain of two, while

the southern block would have two floors removed with six floors being installed for a net gain of four.

Officers presented the proposed layout on the ground floor with the golden layout which presented the slender footprint of the temporary pub which would be expanded into what was existing retail use with more of a food and beverage offer. The very pale colour fronting Fleet Street on the diagram shown would be retail and the yellow colour in the centre of the diagram would be one floor of the proposed new culture use; the pale blue colour for the rest of the site would be 856 units of student accommodation which would be from the lower ground up to the 9<sup>th</sup> floor of the southern block. Officers noted the arrows indicated the entrances to the student accommodation from Bouverie Street and there would be two secondary entrances in red and the culture use entrance, in blue, was prominently located. There was also an additional cycle parking entrance.

The lower ground proposed plan and entrances were presented to Members by Officers which displayed the cultural use in the centre and the Whitefriars Street cultural use to the south of the site. Altogether, with the blue entrance, the area for cultural use would be 1,486m<sup>2</sup>. The green arrow indicated the main cycle entrance for students and other uses and the grey area would be for repurposing the existing servicing area which would be consolidated hours off-peak, except for refuse collection.

A presentation of the existing and proposed north block Fleet Street elevation was shown by Officers to Members, along with the existing and proposed north and south block Bouverie Street elevation. The existing and proposed north and south block Whitefriars Street was also shown to the Sub-Committee.

Members were shown visuals of the existing and proposed frontage of Fleet Street and Bouverie Street and Officers noted the postmodern element which was inserted in the centre, the arch would have the exterior cladding removed and would be re-cladded in Portland stone as it was a Conservation Area and traditional materials would be used. There would also be mansard extensions in slate and the arch would be reshaped and have an accent of green faience, to the south a more contemporary treatment would be visible.

Officers presented the existing and proposed view looking down Whitefriars Street from Fleet Street and noted the more contemporary treatment on display with the additional matting.

The existing and proposed view of Bouverie Street was also shown by Officers who stated that the ground floor of the southern block would existing granite on the site be repurposed and would be etched GRC in a Portland stone lookalike and the levels above would be a green metallic finish with a gradation of different greens. It would also be fluted in appearance.

Visuals of the public realm were presented by Officers of the route looking from Fleet Street to a new area of the courtyard which would be free to roam. Officers stated that the gates would be removed and was much brighter with activity entrances and seating on the pedestrian route. The courtyard was also presented

by Officers who stated that it would also be free to roam with an accessible lift included from Whitefriars Street.

The existing and proposed visual of the development from Temple Gardens and 2-6 and 3 Kings Bench Walk were shown by Officers to the Sub-Committee. Officers indicated that the view presented would probably be the most prominent in longer views with buildings shown in the foreground with the southern block raised just above the foreground buildings. Officers stated the fluted soft green elevation would disappear as one approached the building.

Members were shown a visual of a Level 005 typical student accommodation by Officers who stated the blocks in blue were studio rooms which contained an ensuite along with a kitchen facility included. A more affordable option presented was the cluster rooms highlighted in yellow and shared amenity spaces were highlighted in orange. Officers further stated that the scheme would deliver 10% accessible rooms across the floors on different floors and were highlighted in purple. 35% of the units would be affordable. Officers noted that the lower ground level and lower levels of the student accommodation would have more challenging light conditions, partly due to being at the lowest levels, but primarily as there were limitations with a retrofitted scheme and the urban grain built-up context the site was located within. However, it was comparable with other student accommodation in similar contexts. Officers stated that the cultural offer, highlighted in yellow, and the Tipperary Pub were entirely segregated from one another and the existing lightwell would be an open atrium with a large amenity space located at the lower ground level with roof lights above. Active spaces would be located underneath the well-lit light and the darker areas would be more areas for socialising such as bars.

The Level B1 student amenity spaces proposed plan was shown to Members and Officers stated the amenity space at lower ground level would have no light at all and be used as back-of-house gym, cinema and washing facilities. Cycling storage and Whitefriars Crypt was also highlighted.

The proposed green roof plan and accessible terrace for student use was presented to Members. Officers stated it would be a well-lit roof terrace to be used for dwell space with a perambulation around the roof terrace with attractive views. Officers noted Members were concerned with potential suicide risks and stated that there would be a 2.1 enclosure around the atrium and Condition 34 laid out various requirements in place for the issue to be addressed which included management and training for staff, as well as placement and fixing of furniture and the final details of the balustrade. Officers stated there would be an NHS contribution from the Applicants which would be £45,000 to supplement GP requirements in the immediate area.

The Sub-Committee were presented with a map of sensitive light receptors by Officers. Officers stated they had looked at eight residential units that were affected; six of them were BRE compliant or negligible in terms of the impact. One of the units to the north had some minor adverse impact, in terms of the sunlight, and there was another unit that had a moderate adverse impact in terms of daylight and major adverse impacts in terms of sunlight. Officers stated they

believed this was acceptable on overall planning balance given the urban location and the existing lighting level of such areas.

Members were shown visuals of the The Tipperary (Grade II) elevation onto Fleet Street and the ground floor bar. Officers stated it would be preserved and refurbished, particularly the small cellular nature of the ground floor and the first floor and upper floors would be repurposed to include a dining room. The offer would be expanded into the unit on the left of the visual over three floors which would provide an enhanced food and beverage offer.

Officers presented the Sub-Committee with a visual of the cultural vision of the visitor and learning space which would be provided by the St. Bride's Foundation and would occupy the light blue to the right of the circular light well in the courtyard and would occupy the darker blue in the lower ground floor level. Officers further stated it would be a celebration of everything print related and would examine communication, typography, digital design and graphic design would be considered. Officers noted it would be educational, multigenerational and feed into the curriculum and offered opportunities for workshops, learning spaces, as well as permanent exhibitions and would be prominently located within a main entrance in the courtyard. Officers confirmed the final details would be contained within the Section 106 agreement.

Officers presented a visual of a journey from St. Bride's Foundation through the Salisbury Square development which had emerged and into the new educational offer.

A visual of the existing Whitefriars Crypt (Grade II listed) access via rear lightwell on Ashentree Court / Magpie Alley was shown to Members. Officers stated it had been looked underwhelming. Officers presented the cultural vision for the Whitefriars Crypt and stated the extension would expand opportunities for exhibitions, introduce accessible access, and the look would be in keeping with the award-winning Vine Street Experience.

Officers stated that the Tipperary Pub would be accessible on all floors and a lift would be introduced to that as well.

Officers summarised that the proposals exemplified the City of London's retrofit first approach with exceptional sustainability credentials and would propose an inventive repurposing of a long vacant building in the heart of Fleet Street. The proposals supported good growth and optimised the size through high quality design and delivered fit-for-purpose student accommodation and a mix of complimentary uses with well-being being central the proposals. Officers stated the proposals would support London's higher education offer with a portion of affordable units close to the London School of Economics and King's College which would bring a new population and audience to the locale which contributed to the wider reenergising of the neighbourhood and boosted the economy. The scheme provided 1,480m<sup>2</sup> of cultural space which linked into the existing and emerging cultural ecosystem through an outwardly faced, publicly accessible, and free exhibition of the Carmelite remains which would be open seven days a week. Officers further stated that St. Bride's Foundation would support



educational learning and showcase hidden treasure from a local institution which celebrated print making and reflected the essence of the Fleet Street. The public realm would be enhanced with the ground floor being activated, as well as the accessible pedestrian routes and courtyards to dwell. Officers considered the development to be high quality with an engaging mix of uses which aligned with Local Plan and London Plan policies which embodied the Destination City ambitions. Officers recommended the planning permission and listed building consent to Members to be approved.

The Chairman indicated there were no objectors to the scheme and explained that there were three registered supporters to address the meeting. The Town Clerk confirmed the speaking procedure and outlined each speaker had approximately 3 minutes each.

Mr. Barnaby Collins (DP9) addressed the Sub-Committee and stated the proposal represented an exemplary use of a derelict building by reactivating a redundant asset using retrofit principles to the full. He also stated that office-use was demonstrably unviable as the development consent failed post-implementation and was abandoned eight months into deconstruction works. A third party reviewed financial assessment concluded that office and extension options were unviable. Mr Collins stated the Tipperary Pub had already been reopened and meanwhile uses had been brought forward to bridge the gap between the current unsightly dereliction and the new scheme. A huge improvement would be made to the setting of the Whitefriars Crypt remains and would create a new visitor attraction which would be fully accessible with additional space for an exhibition. Mr Collins informed the Sub-Committee that St Bride's Foundation's involvement was an integral part of the development and would be hugely valuable and influential cultural resource. The proposal would also create a centre of excellence for connecting learners with earners and would allow the City's future achievers to benefit from access to some of the world's leading education establishment. Mr Collins stated that the development would be occupied in full upon opening and would help to revitalise local supporting retail functions and, of the accommodation provided, 35% would be affordable to rent and would equate to over two years of the City's housing supply target. Mr Collins also noted that the application had attracted 19 supporting comments from the public consultation and no objections.

Ian Seaton declared he was a Member of the Court of The Worshipful Company of Girdlers' who had a prior relationship with DP9 who he was not aware was in attendance.

Mr. Jay Ahluwalia (Dominus Group) addressed the Sub-Committee and noted that Dominus Group was committed to the City which was by far the most invested in region in the UK by the Group. The Group had previously delivered student accommodation at Holburn Viaduct and Crutched Friars and, recently, had begun a retrofit scheme for a new hotel at Great Tower Street which would be operated by the group similarly to the Hilton-branded Lost Property hotel near the steps of St Paul's. Mr. Ahluwalia stated that the Group started looking into 65 Fleet Street in detail around the same time last year and had engaged and built relationships with stakeholders across the local community since Christmas. He

indicated the group were delighted to have secured letters of support from the Fleet Street Water BID, Inns of Court College of Advocacy, the Guildhall School of Music and Drama and Dr. Johnson's House. He informed the Sub-Committee that a lot of ideas had developed from those conversations. A number of the 300 affordable bedrooms would go to postgraduate ICCA students who were training to become barristers. He also drew attention to plans to refurbish and extend the Tipperary Pub, the transformation of Whitefriars Crypt to create a brand-new public realm. Mr Ahluwalia also stated he was delighted to be working with the St Bride Foundation to bring forward new cultural spaces which had the potential to reconnect Fleet Street to its printing heritage. Since the planning application had been made, Mr Ahluwalia noted the Group had continued to listen and had remodelled the massing and detailing of the upper parts of the building and included a commitment to accommodating deliveries within the service bay on Whitefriars Street to maintain access to Salisbury Square and stated that the Group were committed to providing the best-in-class on-site management. He informed the Sub-Committee that 65 Fleet Street would be professionally managed subject to a student management plan and there would be a community liaison officer who would provide a single point of contact for the local community amongst a community liaison group. A student liaison officer would also be the primary contact for students, in terms of their health and well-being and managing disturbances. He suggested that together, the community liaison officer and the student liaison officer would ensure the community had a voice throughout construction and operation. Mr Ahluwalia summarised that, should Members be minded to approve the application proposed, the Group were committed to delivering an exemplary retrofit scheme which would boost the City's attractiveness to talent, would broaden the cultural offer and would bring new life and activation to Fleet Street, the benefit of which would be felt for years to come.

Ms. Alex Swatridge (St. Bride Foundation) addressed the Sub-Committee and stated that St Bride Foundation held an internationally significant collection which celebrated the history of print, graphic design, typography, publishing and beyond, and played a vital role in the creative industries both nationally and internationally with extensive talks and workshop programmes. She noted that the partnership with Dominus Group presented an opportunity to expand the Foundation's current activities to create a destination campus across two distinct sites and the chance to bring to bring print back to Fleet Street to provide learning opportunities for creative communities and the general public.

Ms. Helen Arvanitakis (St. Bride Foundation) addressed the Sub-Committee and stated that the Foundation had taken a holistic view in developing an expanded lifelong learning programme across the campus where visitors of all ages could explore the art and craft of printing through workshop demonstrations and hands-on activities. She noted that the new cultural space at 65 Fleet Street would provide a free to access public exhibition which would tell a story of print of Fleet Street. This would lead to learning spaces focused on providing a schools and young persons education programme and would significantly strengthen the Foundation's ability to engage audiences and significant expand its reach and impact. She also stated that the Foundation would be able to create an archival standard space to care for the most unique and vulnerable areas of its collections

and the development would enable the Foundation to champion community creativity and would become a vibrant hub for exploring design, creative skills and Fleet Street's rich heritage. Ms. Arvanitakis further stated that to ensure the vision could be fulfilled, the Foundation and Dominus Group were working together to devise a sustainable model for the programme and would be initiating a fundraising campaign if planning permission were to be granted.

The Chairman invited Members to pose questions to the Applicants.

A Member congratulated the architect for the innovative way in which the building was going to be used and noted it was difficult to get accommodation on large floor plates and would be achieved using a large atrium. The Member queried whether the atrium itself would be open or closed as an open atrium could create an outside atmosphere to the internal student accommodation. Mr. Ian Ferguson (Dominus Group) explained it would be an open atrium.

The Chairman invited Members to pose questions to planning Officers.

A Member sought assurance that all the necessary fire regulations and precautions would be in place as it was a high occupancy residential block and whether the installation between each unit was sufficient to ensure there was no overhearing noise from other units. Officers confirmed that it would all be covered in the building control regulations.

The Chairman moved the item to a vote.

Votes were cast as follows: IN FAVOUR – 16  
AGAINST – 0  
ABSTENTIONS – 0

The Sub Committee - **RESOLVED –**

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.

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

The Sub-Committee received a report which sought a change of use of part of the ground floor and part of the basement floor from commercial use (Class E) to a mixed use, including a noodle bar with café and part leisure (mini golf) at ground

floor level, and ten pin bowling and ancillary facilities at basement level (Sui Generis).

Officers presented the report and the site location plan was shown to Members. Officers stated that the application site was located on the northern side of Fleet Street and was within the Fleet Street Conservation Area and the principal shopping centre designation. The building was not listed. The building currently housed offices on the upper floors and a bank on the ground floor and basement level. The bank had been vacant since 2021 and was the subject of the applications.

Members were shown an aerial view of the existing building which showed the surrounding properties, notably Johnson's Court to the north and west of the site and St Dunstan's Court and Bolt Court to the east.

Officers showed the existing unit at street level and confirmed the proposed development was for the ground floor element in the photo only with the access on the right-hand side of the elevation. It was noted by Officers that it would be the sole access point which would lead directly onto Fleet Street.

The proposed ground floor level was presented to Members and Officers stated it would feature a noodle bar, a café and mini golf. It was also noted by Officers that the levels of the ground floor were partially subterranean at the rear.

Members were shown the proposed basement plan. Officers noted the proposal sought to introduce bowling and ancillary facilities and the site could have a capacity of up to 250 people at any one time.

Officers showed the existing unit from the Fleet Street view from the west and stated the application was recommended for approval, subject to conditions detailed within the report and the addendum. One condition of note secured the opening times of 10:00am to 12:30am Monday to Wednesday, 10:00am to 1:30am Thursday to Saturday and 10:00 – 23:30 on Sunday. Officers noted the hours were the same as the those approved by the Licensing Committee on 16 April 2024. Officers stated that the conditions also secured approval of a management plan which required the use of the main access on Fleet Street for customers and staff only, the restrictions on delivery and servicing hours, the requirement for no music to be heard outside the premises and the prevention of the surrounding streets being used by customers.

Officers concluded that the proposal would contribute to the function and character of the principal shopping centre by bringing about an active frontage in line with policy and would help to rejuvenate the commercial Fleet Street area. Officers also stated the conditions were proposed to prevent undue harm to the surrounding neighbours. The proposal was recommended for approval subject to the conditions detailed within the report and the addendum by Officers.

The Chairman invited the objectors to address the Sub-Committee.

Mr. Jeremy Simons addressed the Sub-Committee stated he had lived and worked for over 40 years in the immediate vicinity of the premises in Pemberton House prior to its conversion to apartments and had been a resident of 4 Pemberton Row for the last 26 years. He noted that the residents of Pemberton Row were concerned at the breakout of noise from the rear basement adjacent to the proposed bowling alleys which would be via the noise at Johnson's Court. Mr. Simons stated this was immediately opposite three flats at number 3 Johnson's Court and faced the rear of six flats at 4 Pemberton Row with 5 whose bedrooms would face the void. He told the Sub-Committee that the curators cottage of Dr. Johnson's House was also in the immediate vicinity, so there were 10 noise sensitive receptors concerned. Mr. Simons recommended a condition should be imposed to ensure there was no noise breakout after 11:00pm with noise levels below 50DB between the hours of 11:00pm and 7:00am. That would ensure that residents could continue to benefit from the quiet enjoyment of their home.

Ms. Annabel Graham Paul, who spoke on behalf of Professor Rebecca Bailey-Harris and Dr. Kirsty Mann, who are residents of 6 Bolt Court. Ms. Paul noted that the Officers advised that it was necessary to impose a condition which restricted the hours of operation in order to make the development acceptable. However, it was stated whether the hours recommended were acceptable as policy DM 3.5 on nighttime entertain made clear that conditions to ensure hours of closure to protect amenity were necessary to safeguard quiet times for residents. Ms. Paul also stated that policy DM 21.3 on residential environment said similar things and the proposed closing at 12:30am Monday to Wednesday, 1:30am Thursday to Saturday, and 11:30am on Sunday was too late as the report recorded there were a large number of residential occupiers in the immediate vicinity. Ms. Paul told the Sub-Committee that vicinity residents were entitled to peaceful sleep after 11:00pm and it was no more reasonable for residents to be subjected to noise at 1:30am than it would be to be subjected to noise at 2:30am. She stated that the City's Licensing Sub-Committee was concerned with a very different issue concerning the prevention of public nuisance which was altogether a broader concept than the planning policies which demanded no unacceptable impact on the amenity of residents from noise and disturbance from customers who arrived and left the premises. Ms. Paul stated that it appeared the Licensing Committee's approved hours had been accepted by Officers without analysis as to how they accorded with planning policies 3.5 and 21.3. and noted the reason for proposed condition four did not contain a reference to the relevant policy 3.5. She further stated that the Licensing Committee decision was subject to an outstanding appeal which by consent of all parties had been held in abeyance pending the Sub-Committee's decision and the Sub-Committee was not bound by the Licensing Committee's views formed in a different context. Ms. Paul concluded by stating that the planning policy in particular had to be applied to what was necessary to ensure there was no unacceptable impact on residential amenity.

Mr. Toby Brown gave a presentation to the Sub-Committee and Members were shown a photograph of Bolt Court with 6 Bolt Court on the right and the exit from the development on the far left. Mr. Brown stated he spoke for many local residents to explain what it was like to live at Bolt Court and noted they were

worried as expressed by the 30 objections that had been received from neighbouring commercial and residential premises. Mr. Brown stated that while nearby the Courts was busy in the day due to the busy roads, it was quiet in the evenings which allowed residents to sleep. He noted residents were vulnerable in Bolt Court due to it being a historic (Grade II) listed building which secondary glazing could not be added to. This created an echo chamber, and sound would travel when people congregated in the courtyard or at St Dunstan's Court. Mr. Brown conveyed that while this was acceptable in the daytime, it was a different in the evenings and residents would occasionally be woken up by inebriated people or groups who travelled through the courtyard as the sound would be amplified. Mr. Brown showed the Sub-Committee a map of the surrounding area with the number of residents indicated. He informed the Sub-Committee that he lived at Bolt Court for 13 years and stated it was important that it was peaceful in the evenings so residents could work and sleep. He also stated there were a number of families in the area who lived with children. Mr. Brown showed an image of the closing times of alcohol licensed premises in the area with licensed hours to midnight and later and noted there were traditional pubs on Fleet Street, as well as bars and restaurants, which residents valued as a historic part of the area. Mr Brown stated that he supported the campaign for the Tipperary public house to be protected as an asset of community value and that the bars and restaurants nearby were all of modest size. Mr. Brown stated that while the presentation from the Officer had shown there were late night licenses in the area, the reality was that Fleet Street had all its premises closed by 11:00pm and many were closed at the weekends. He conveyed that the nightlife coexisted with residents and the development had been presented as a sporting or leisure centre, when in reality it was a late-night drinking establishment with games on the side. Mr. Brown noted he was aware of this as he had previously been to similar establishments with stag parties and corporate evenings and stated they were influenced heavily by alcohol and customers could walk in to drink without playing the games. Mr. Brown told the Sub-Committee his experience of being a resident at Bolt Court was people would use the various alleyways of Fleet Street as cut throughs to get from Fleet Street to Farringdon station and some of those groups would end up in courtyards and alleyways and be understandably noisy, particularly if they had been drinking. He stated the capacity of the development of up to 250 people at any time, or 2,500 across the day, worried residents and it would be the only late-night venue with the hours proposed after other venues had closed. Mr. Brown concluded that residents were concerned that there was no power to control the behaviour of customers once they had left the premises and requested the Sub-Committee did not put residents in a position where they were woken up at night by customers after 11:00pm.

Ms. Annabel Graham Paul addressed the Sub-Committee in her own capacity as an objector. Ms. Paul stated no evidence had been put forward by the applicant to indicate that the business would be unviable without the late opening hours and urged caution on the hybrid nature of the premises, which was a relatively new type of business in London without many precedents, until its operational impacts were better assessed. Ms. Paul told the Sub-Committee that would be the responsible way to reflect the London Plan's Agent of Change that if there was no potential problem with noise and disturbance, then it would be open to Bloomsbury Leisure Holdings to apply to extend their hours by way of condition

variation. Ms. Paul stated that, by contrast, there would be no scope within the planning regime to reduce the hours if the condition did not protect residential amenity and urged the Sub-Committee to impose normal operating hours for a venue of its kind; with an 11:00pm closing time Monday to Saturday and 10:00pm on Sunday. Ms. Paul concluded that to not do so would otherwise result in an unacceptable impact on residential amenity and would be contrary to the city's planning policies. If the Sub-Committee did not feel a condition could be imposed, Ms. Paul urged the refusal of the planning permission.

The Chairman invited Members to ask questions of the Objectors.

A Member asked the Objectors to provide an idea of what the noise was like along Fleet Street, particularly on weekends, and whether the Objectors were aware there was a condition on new developments, with a retail or bar element on the ground floor, which would limit operating hours until 11:00pm. An Objector stated they were a doctor working in intensive care and the importance of being able to rest at home. They stated the area was peaceful at night and relatively little background noise from Fleet Street. However, the area was sensitive to amplification of noise and noted that, if someone was stood outside having a conversation on the phone or in a group, the noise bounced up the building like a cave and conversations would be heard. The Objector stated there was an office party a few years ago, of around six people, and even though the windows were closed, residents could hear everything at the party. They further stated that people would congregate in the alley during the day to smoke and the sound was more amplified when they were stood underneath the archway. They noted the developer would have no control over how customers left their premises and whether people would congregate under the archway and, while it did not matter during the day, it did matter in the evenings as residents would hear everything.

A Member stated there was a significant business of hen-dos and stag parties across the City and queried whether this was currently being seen on Fleet Street. The Objector confirmed they were not. Another Objector stated that public houses in the area were wonderful parts of the Fleet Street community, and the reality was that most people would disperse by 10:00pm, even on a Thursday or Friday.

The Chairman invited the Supporter of the application to address the Sub-Committee.

Mr. Stuart Minty informed the Sub-Committee he was a Chartered Town Planner who represented the Applicant. Mr. Minty stated that the applicant was an experienced license holder who ran a large number of existing leisure venues throughout the City of London and further afield in Greater London. The site was located in the central activity zone, the Fleet Street Conservation area and the principal shopping centre. He noted it had previously occupied as a bank and had been vacant since late 2001. Mr Minty stated the intention was to provide a new leisure venue comprising of a noodle bar, café, mini golf facility at the ground floor with tenpin bowling and ancillary facilities in the basement. The business model was for corporate businesses predominantly during the week and families and parties at the weekend, and felt the proposal complied with the development

plan and encompassed a number of public benefits. Mr Minty stated he appreciated the concerns raised with the public representations around the impacts on local amenity and they were taken seriously. He stated the conditions included were applauded and felt they would suitably control those potential impacts. Mr Minty stated the lawful use of the premises was Class E and the proposal would align to the changes within the use classes in order to provide a flexibility for businesses and adapt and diversify to meet the changing demands and better reflect the diversity of uses required to attract customers and make the business viable now and in the future. Mr. Minty stated that the proposal supported the aims of policy DM20 and it would retain the ACT street frontage and would contribute to the function and character of the principal shopping centre and would provide facilities to the City's workforce and residents, as well as enhance the vitality of the area. Mr Minty stated the supporting text of policy S22 confirmed that the primary shopping centre was underperforming and, therefore, the application had potential to diversify and that would included bring forward a broader range of leisure facilities and retail to extend activity into the evenings and weekends. Mr. Minty further stated that the management strategy confirmed that Fleet Street contained a diverse mix of uses: shops, restaurants, public houses, wine bars, banks, building societies, and other agencies which all made a fundamental contribution to the vitality of those areas. He stated that the mixed-use facility would not be out of character with the location and would bring it back into use. It would encourage footfall back into area and reinforced the special character of the conservation area. Mr. Minty stated local amenity had been discussed at length and felt the use intended for the development would not depart from the character of the area and there were a number of planning conditions which would suitably address concerns raised from the public about anti-social behaviour. Mr. Minty made reference to the Licensing Committee which the related application was discussed at in April 2024 and stated that concerns, such as anti-social behaviour and noise nuisance, were considered and evaluated at that meeting as they were at this meeting. He further stated that the Licensing Committee wanted to ensure an appropriate balance was struck between the context of the area, the need to encourage business while addressing concerns raised by the residents. Mr Minty noted that the principal activity was crazy golf and that was acknowledged in the Licensing Committee papers; the eating and drinking services were ancillary. The pack for the April 2024 meeting and the pack for the meeting of Planning Applications Sub-Committee also recognised that the premises had a booking system which allowed for the gradual flow of patrons entering and leaving the premises. Mr Minty stated that most of the use would be underground which would assist with noise attenuation and the hours that had been put forward by the Officers aligned with those approved by the Licensing Committee and would be controlled by planning condition. He also stated the applicant had put forward a management plan that outlined measures to protect the outside amenity, which included weekly risk assessment, customer management and dispersal, and noted that with the nature of crazy golf, customers did not all leave the same time as they may do with a public house as they would be booked in to play their round of crazy golf which would generally take an hour to finish for 18 holes. Mr Minty concluded that the sole entrance was at the ground floor level and the side entrance was mainly for fire and emergencies.



A Member queried why there was a need for a permanent 1:30am licence as corporate clients would often request services into unusual hours of the morning to maximise the value of the event. The Member stated that it was common for attendees to leave these events early, usually by 10:00am and other venues would often apply for temporary licenses to accommodate such contracts, which were often granted, that would allow them to host the event without being committed to a permanent late-night licence. The Member stated they were concerned that if other venues closed earlier, individuals seeking continued service may migrate to this location which could result in undesired patrons and could create a scenario that may be challenging to manage without causing disturbances. He suggested that the viability of the business model was likely based on hosting corporate functions who wanted an activity element alongside provision of alcohol and would be better served by applying for temporary consent for later hours when required. The Member also asked the Chairman whether this was a discussion within the remit of the Planning Applications Sub-Committee. The supporter stated a permanent consent had been applied, but if there was a feeling a temporary consent would be more appropriate, dependent on what that temporary consent would entail, advice would have to be sought from the client. The supporter noted he understood why use of a temporary consent had been raised as it would allow the evaluation of how the use was performing and stated there was a management plan with the application already that required review after a year. However, it did not include the opening hours. The supporter indicated they were open to the suggestion of a temporary consent if that was the consensus of the Sub-Committee.

A Member asked whether there would be a walk-in mechanism for crazy golf and the bowling. The supporter stated the experience of the operator was that 90-95% of customers booked in advance as they wanted the certainty of an hour to play. However, walk-ins would be accepted if there was space.

It was asked by a Member whether market testing had been carried out to demonstrate the market for business was there and queried whether it would not be reasonable to accept the closing hours that had already been seen with other establishments in the area. The supporter stated that the applicant wanted flexibility to be able to operate their business throughout the day and the evening and that would attract a clientele with different and different people throughout the day. Therefore, the evening activity would allow for that flexibility. The supporter noted that customers would have to be in the venue for an hour before they left.

The supporter was asked by a Member to what extent work was going to be done with neighbours to deal with the challenge to the peace and quiet in the area. The supporter stated that the applicant was experienced in leisure facilities and had been operating a successful scheme in Camden for 20 years and had another venue in Marylebone. With regard to demand, the supporter stated he was not sure but indicated crazy golf was popular and bowling had been popular for a number of years and there was a growing trend of similar facilities, including those relating to darts or cricket. The supporter stated that the resident interaction was very important and were open to suggestions, whether it be a management group and how often it would meet.

The Member asked whether if a proposal was made to reduce the operating hours to 11:00pm Monday through Saturday and 10:00pm on Sundays as it was common practice in the area. The supporter stated the applicant would need slightly more than that and felt it was too early for the business operation. However, he indicated the Member would be more willing to compromise on days in the middle of the week, particularly Monday, Tuesday and Wednesday, but felt Thursday, Friday and Saturday would require later opening hours and would be consistent with other operations.

A Member sought an explanation on what the facilities would entail and queried whether it was possible for customers to engage in crazy golf, bowling downstairs and utilise ancillary facilities simultaneously.

The Member also stated they believed that the City typically applied an 11:00pm restriction for new developments where, if it proved successful and agreeable to all parties, the applicant could later request extended hours. Therefore, they suggested that trading 13 hours from 10:00am to 11:00pm would be highly viable as it aligned with the model already used across the City and queried why the current model would not be feasible for the development before the Sub-Committee. The supporter stated that the business had to appeal to different people and those who may visit at 10:00am would be different to those who visited at 10:00pm. The supporter noted it depended on a number of variables such as whether customers were at a corporate function or a party and were trying to appeal to as many audiences as possible. The supporter stated it would be a managed function, customers would not all leave at the same time and there was a maximum occupancy of 250 people, but the reality was that customers would leave slowly, one group after the other. It was further stated by the supporter that the applicant was willing to look at reduced opening hours, despite the hours suggested on the application having been granted by the Licensing Committee, as they understood concerns raised and the want to monitor the situation given it was a new use in a new area. However, the supporter noted that lowering the operating hours on Thursday, Friday and Saturday would undermine the business function and would concern over significant reductions.

A Member asked the supporter whether the applicant would accept a condition proposed by an objector earlier in the meeting on noise that emanated from the void in Johnson Court. The supporter stated there were noise conditions already recommended and was conscious that anything additional would overlap or supersede, but were happy with the noise mitigation as outlined.

Another Member stated that the lightwells referred to previously were not lightwells, but fire control devices. The supporter agreed that was the case.

The Chairman invited Alderwoman Martha Grekos to address the Sub-Committee and indicated she had 5 minutes to speak. Alderwoman Grekos stated she objected to the applications on three grounds as it was contrary to the current policy DM 20.1, an emerging policy RE2 which encouraged active frontages and resist their loss. She also stated that the Officer report mentioned policy DM20.1 but omitted to mention policy RE2 despite stating that the draft

plan did have weight and was of material consideration. Alderwoman Grekos stated she was aware that the Committee had a site visit and were specifically told that the show windows would all be covered and no one would be able to see through them. Alderman Grekos questioned why this had been done, whether there was something to hide and queried how it contributed to the function and the character of the principle shopping centre and enhance its vibrancy. She stated that the activation of the frontage was lost and the shop might as well be boarded up and disagreed with the Officer's conclusion that the proposal was acceptable in land use terms and stated it was clearly not. Alderwoman Grekos also stated it was contrary to current policy DM 3.5 which set out that any proposals for new nighttime entertainment and related use would only be permitted where there was no unacceptable impact on the amenity of the resident or on environment amenity. She told the Sub-Committee that it had heard from a resident and saw it was predominantly a residential area again which the Officer reports had failed to mention. Alderwoman Grekos stated the applicant had submitted a management plan after she had submitted her objection saying they had not submitted the management plan and further stated that the Licensing Committee hearing dealt with the prevention of public nuisance and not the planning policy considerations before the Sub-Committee which was regarding no unacceptable impact on the amenity of residents. This was a different test and higher threshold for the applicant to meet. Alderwoman Grekos also stated that the report failed to mention that the Licensing Committee decision had been appealed and was very much a different regime to the one before the Sub-Committee and noted she did not believe that the management statement addressed the concerns of residents and local businesses, and both had objected. Alderwoman Grekos stated that just saying customers would not be permitted to use, stand, consume food or alcohol during operating hours outside was not sufficient as she questioned how it was to be policed at 1:30am. She also told the Sub-Committee that one form of creating no unacceptable impact was reducing the operating hours. Alderwoman Grekos questioned whether Members of the Sub-Committee would allow such proposals in their respective wards and stated she suspected the answer would be no. She asked why the development would be allowed in its location when it was contrary to policy and some business owners were relocating outside the City boundary given they had seen that the Corporation's planning committee had allowed such entertainment venues when the City of Westminster had imposed far more stringent restrictions. Alderwoman Grekos stated that such proposals did not help with the economic recovery of the City and doubted very much that large corporates would be booking for their staff to be attending such premises until 1:30am in the morning and was not the image any corporate would want to give out at present. She also stated that it did not fuel the local economy as there was limited passing trade and noted 90% of the customers would be pre-booked. She stated that was only to fulfil the needs of hen-dos and such other parties that were no longer welcomed in premises in the West End as the Council there had imposed condition on operations. Alderwoman Grekos told the Sub-Committee that the City was attracting proposals that wanted to exploit flexibility when other councils were restricting hours and asked why the Sub-Committee should accept proposals that would only haem the City and create a bad precedent for other venues to come into the area. She also stated she was aware of the adult gaming centre being proposed diagonally opposite the venue proposed. Alderwoman

Grekos stated that Fleet Street was meant to be thriving in a few years as there was a lot of work happening there. It was going to be a legal quarter mixed with a substantial amount of residents, which included the consent given to the building of 815 further student accommodation units, as well as banking, insurance, accounting and other industries with retail and hospitality to match those consumers.

The Chairman invited Members of the Sub-Committee to pose questions to Officers.

A Member asked Officers whether consideration was given to the licensing hours of other licensed premises in the area and whether the conversation was around the long operating hours into the evening given it was a residential area. Officers told Members that the application was assessed with its own merits and stated that Officers were cognisant to residential amenity and impacts upon that which was why the management statement was received during the application to appear comments that had been made. Officers stated, with regard to the opening hours, that they had found them acceptable in planning terms and environmental health terms as well.

The Chairman invited Members of the Sub-Committee to debate the application.

The Deputy Chairman stated that residential amenity was a key consideration on other planning applications, referring to the Sub-Committee having pulled back the terminal hour that outdoor office terraces could be used in residential areas, and noted as part of such decisions that Members were aware of City policy that residents were entitled to enjoy an undisturbed night's sleep between 11:00pm and 7:00am. The Deputy Chairman also stated that the Sub-Committee had previously passed motions to close such terraces well before 11:00pm and ward members were surprised that the Licensing Committee had ignored the principle by agreeing to a terminal hour of 1:30am, with alcohol being served until 1:00am on some evenings at the location proposed. The Deputy Chairman noted that many licensed premises did apply for a terminal hour of midnight which did not attract the late-night levy, but closed at 11:00pm or earlier as can be seen by the map produced by the Objectors. The additional hour provided rarely used flexibility for special occasions. The Deputy Chairman stated the proposed premises for development was different as, at the Licencing Committee hearing, it was clear that the prospective operators intended to trade for as long as the permitted hours allowed and originally sought permission to sell alcohol until 2:00am, 7 days a week. The Deputy Chairman told the Sub-Committee that the Agent of Change Principle was specifically called out in the new Local Plan and was included in the National Planning Policy Framework (NPPF2) which came into force in 2018. The principle was not a consideration for a Licensing Committee application, but was for a Planning application. The Deputy Chairman stated that the 'agent of change principle' encapsulated the position that a person or business (i.e. the agenda) introducing a new land use was responsible for managing the impact of that change. The Deputy Chairman stated that near the residential alleyways immediately to the north of Fleet Street, there were no licensed premises that stayed open until anytime near to 1:30am. Therefore, the Applicant was clearly the Agent of the proposed significant change and had legal

responsibility to mitigate the potential impacts. The Deputy Chairman noted that, as many Members of the Sub-Committee who had also served on the Licensing Committee were aware, once customers left licensed premises, the operator had no control over their behaviour and it was common that customers who had been drinking until the early hours were then decanted onto the streets, were often noisy and caused numerous other problems when they left. The Deputy Chairman told the Sub-Committee that the proposed hours of servicing for the premises excluded 11:00pm to 7:00am which acknowledged the City policy, but was inconsistent with the proposed trading hours.

**MOTION:** The Deputy Chairman proposed a motion that the terminal hour for closure of the premises was brought back to 11:00pm every day to protect residential amenity.

The Chairman asked if there was a seconder, and a Member agreed to second the proposed Motion.

The Chairman invited the Sub-Committee to debate the Motion proposed.

The Chairman stated he fully supported the Motion proposed and the Motion was not against a nighttime economy but was in keeping with the character of the area and what the City wanted to achieve with the Destination City Programme. The Chairman told the Sub-Committee that it was a great scheme and, in principle, agreed with wanting the kind of leisure activity proposed in the development in the Square Mile and more of it was needed.

A Member stated they supported the Motion and noted that new builds already had conditions in place for bars and restaurants to have trading limited to 11:00pm. The Member stated there was an option for those establishments to negotiate that limit and a number of precedents had been set for bars and restaurants which were limited to 11:00pm and a condition had recently been put in place on a bar in Tower ward and that operator felt they were more than capable of running a viable business in those hours, as were a vast majority of all the licensed premises. The Member stated further that only a handful of licensed premises operated past 11:00pm and a previous application at the meeting had its use of a terrace limited to 6:00pm due to the impact on residential amenity. The Member referred to a previous application from the meeting, that granted an application which would bring in 900 new residents on Fleet Street, which included a letter from the NHS that discussed that noise could be a contributor to stress and poor health. The Member stated that it was very difficult for people to get back to sleep once they had been awoken and it did not take just drunken behaviour to wake people up as someone who was speaking loud on their phone could also wake residents up. The Member welcomed the opportunity to have a new mini sport in the City and stated they believed that the Applicant would work in harmony with the residents if Members supported the Motion limiting trading to 11:00pm. The Member stated that once residents understood the model, and there was room for renegotiation, the Applicant could always return to change the limit, but felt the Motion would ensure security for both parties while a change in use was underway.

Another Member stated he agreed with most of what the Deputy Chairman had to say and noted he lived at a residential enclave, where the residents were right next to the facilities, where licensed premises were limited to 11:00pm, except for Fridays and Saturdays, and suggested the Sub-Committee could be more flexible on those two nights.

A Member stated that the Sub-Committee was discussing the residential impacts and, regardless of what other premises did in other parts of the City, the Sub-Committee had been told that it was a very quiet area at the weekend and, therefore, later hours at the weekend would have a greater impact.

Having debated the Motion, Members proceeded to a vote:

Votes were cast as follows: IN FAVOUR – 12  
AGAINST – 1  
ABSTENTIONS – 0

The Motion was carried.

The Chairman moved the meeting back to the debate stage.

A Member stated the premises would represent a significant change to the area and, given the amount of investment being put into the law courts at Fleet Street, it was important to get the tone right and expressed concerns that, as the whole developed would not subterranean, the impact on residents would be significant. The Member, who stated he had lived near a similar environment in the past, stated it would be a nightmare and drive people out of the area and was a fundamental change.

The Chairman moved to a vote on the substantive item as amended by the Motion carried:

Votes were cast as follows: IN FAVOUR – 10  
AGAINST – 2  
ABSTENTIONS – 1

The Sub Committee - **RESOLVED –**

(1) That Planning Permission be granted for the above proposal, as amended by the Motion carried, in accordance with the details set out in the attached schedule.

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

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

A Member raised a question regarding Alban Gate with a plea to ensure that the escalators worked as they had not worked for two and a half years and asked Officers to update them on the issue. Officers indicated they would bring it to the attention of the applicant and the planning agent.

The Member also raised a question on waste management for 81 Newgate Street, checking that the residents of Little Britain had been given an opportunity to comment. Officers stated that they did not ordinarily consult on the approval of details, but they were aware of the application, and anyone could comment on those.

A Member stated they were mindful that not all the responses to questions by Members were in the public domain and had been given comfort by responses to question which was why they had not been asked at the meeting of the Sub-Committee. However, the Member stated they thought it was important there was a public record or were attached to the minutes. Officers told the Sub-Committee that all Members would usually be copied into responds to Members on planning queries and, while Members may not wish for all the responses to be in the public domain, they stated they would discuss with the Town Clerk's Department. Another Officer suggested, as it was not time critical, that it be picked up as a question at the next meeting of the Sub-Committee which would give Officers time to prepare a response that was appropriate for both the public and potentially the non-public aspect. The Chairman stated Officers could come back to the Sub-Committee on that at the next meeting.

**RESOLVED** – That the report be noted.

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

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

**RESOLVED** – That the report be noted.

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

There were no questions on matters relating to the work of the Sub-Committee.

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

The Chairman stated the London Planning Awards were held recently and the Vine Street Roman Wall exhibition won the best heritage and cultural project, 8 Bishopsgate won the best sustainability project, the lighting SPD and 8 Bishopsgate were commended and 3D Heritage Views and Growth Capacity Modelling work was also shortlisted.

The Chairman noted that Rob McNichol had been shortlisted as inspiration leader at the Royal Town Planning Institute National Awards for Planning Excellence.

The Chairman reminded Members that there was a planning training session on Friday 1<sup>st</sup> November at 9:00am.

**The meeting ended at 1.44 pm**

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Chairman

**Contact Officer: Callum Southern  
Callum.Southern@cityoflondon.gov.uk**



# Agenda Item 4

<b>Committee:</b>	<b>Date:</b>
Planning Application Sub-Committee	6 December 2024
<p>Allianz House 60 Gracechurch Street London EC3V 0HR</p> <p>Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).</p> <p>Re-consultation due to amendments.</p>	<b>Public</b>
<b>Ward:</b> Bridge And Bridge Without	<b>For Decision</b>
<b>Registered No:</b> 24/00743/FULEIA	<b>Registered on:</b> 11 July 2024
<b>Conservation Area:</b> N/A	<b>Listed Building:</b> No

## Summary

### Site and surroundings

The application relates to a 0.22 hectare site on the corner of Gracechurch and Fenchurch Street within the Bridge and Bridge Without ward in the south of the City of London. The site is bounded by Gracechurch Street on its west side, Fenchurch Street on its north side, the adjacent building at 55 Gracechurch Street and St Benet's Place on its south and southeast side and a courtyard with the buildings at 6 - 8 Fenchurch Street and Philpot House on its east side.

The application site is a 9 storey building with 2 basement levels comprising 16,158sqm (GIA). There is retail activity on the ground level and offices on the upper floors. The site also includes an area of public highway around the perimeter of the building along Gracechurch Street and Fenchurch Street.

The north frontage of the building, along Fenchurch Street, falls within a designated Principal Shopping Centre (PSC) (Leadenhall Market). There is currently one retail unit at ground/lower ground floor level along the full extent of the PSC frontage.

The application site is not situated within a Conservation Area and the existing building is not listed. Bank Conservation Area boundary extends along the west side of Gracechurch Street, across from the site, and to the east and south east is the boundary of Eastcheap Conservation Area. The existing building is not considered to be a Non-Designated Heritage Asset (NDHA). Part of the site falls within 'sites of additional archaeology' as identified in the City Map. There are a number of designated heritage assets in the immediate vicinity of the site which are identified and addressed below in the heritage section of the report.

The context of the site is mixed use with retail/commercial uses on the ground and lower levels and office at upper floors. There are some residential properties around the site with the closest being to its south-east.

### Proposals

Planning Permission (23/00469/FULEIA) is sought for the demolition of the existing building, retaining the existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys. The proposed building would be mixed use including, predominately offices (Class E), with complementary retail / cafe use (Class E) on ground level and a free publicly accessible area at level 35, including a roof garden and a learning space (Sui Generis). At ground level a public realm would be created underneath the building with direct level access to

Gracechurch Street. This area, referred to in the application as the 'Undercroft', would comprise 368sqm of sheltered public space with available public seating. Its bio-friendly character with features of greening would allude to the public roof garden and therefore create an interesting point of arrival for its visitors. One accessible car parking and visitor cycle parking spaces would occupy the southern part of this public realm. The Undercroft would have a dual purpose, offering a public space by day and a servicing area by night. Permanent footpath widening and repaving works are proposed on the public highway to the perimeter of the building along Gracechurch Street and Fenchurch Street.

A dedicated cycle entrance would be formed with direct access from Fenchurch Street, at the northeast side of the building, providing access to a ground floor lobby and to three lifts leading to the basement cycle parking. A total of 849 long term bicycle spaces would be provided with associated shower and locker facilities and 41 short stay spaces would be provided (14 of which are proposed to be located in the Undercroft).

### Environmental Impact Assessment

An Environmental Statement prepared by Trium accompanies the scheme, which assesses the likely significant environmental effects that have the potential to arise as a result of the proposed development, both during the demolition and construction works and on completion and occupation of the proposed development. The environmental disciplines identified in the Environmental Statement include Air Quality, Noise and Vibration, Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, Wind Microclimate, Heritage, Townscape and Visual Impact Assessment, and Climate Change. This Committee must consider the information to make a reasoned conclusion on the significant environmental effects identified in the Environmental Statement and considered in Appendix A of this report.

### Consultation

The consultation process of the planning application commenced upon validation of the application in July 2024 for a period of 30 days. Following amendments to the proposed design relating primarily to the set back of the western bay of the proposed east elevation to separate this section of the proposed tower from the party wall, updates to the initial submission documents, including the Environmental Statement, were submitted to the Local Planning Authority in October 2024 and a second round of public consultation occurred on the 22<sup>nd</sup> of October 2024 for a period of 30 days.

The additional information received over the course of the application process and all consultation responses received over the two rounds of consultation have been taken into consideration in the assessment of the application and for the purposes of reaching the reasoned conclusion.

Objections and comments have been received from statutory consultees including Historic England, Historic Royal Palaces, St' Pauls Cathedral, the London Borough of Tower Hamlets, relating to the design of the development, its impact on designated heritage assets and the impact on the environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S.106 obligations.

The application received three public representations over the course of the application. One comment was neutral and the other two were from residents of the Jamaica Buildings objecting on the grounds of the impacts caused to the amenities of nearby occupants caused by additional development, primarily during construction, in a dense and overdeveloped urban area and recommending planning conditions to take into consideration restrictions on nighttime construction. This report has considered these comments, including any requisite mitigation which would be secured by conditions.

#### Proposed Offices, Retail, and Public spaces

The site is within the Central Activities Zone in a highly sustainable location. The proposal would deliver a high quality, office-led development in the emerging City Cluster, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses and maintaining the City's position as the world's leading international, financial, and professional services centre.

The scheme would provide 52,012sqm (GIA) of flexible Grade A office space (Use Class E(g)) on the site suitable for circa 3,295 FTE City workers. The site is central to the City's growth modelling and would deliver a significant proportion of the required commercial space to meet projected economic and employment growth demand until 2040. This quantity of floorspace would significantly contribute to maintaining the City's position as the world's leading international, financial and professional services business centre.

The proposed office floorplates would offer high quality 1,000 to 1,300sqm net floor suitable to a multitude of large and smaller occupiers. A variety of private outdoor amenity spaces would be provided. A podium floor would be located at level 6, providing a large external terrace on top wrapping around the north and west elevations offering 250sqm of private amenity space with views to the west over the Bank Conservation Area. Level 34 would also provide another large external amenity space of 223sqm for the use of the office staff.

The commercial office space would be complemented by the provision of 187sqm of retail / café space at ground level, 611sqm (GIA) of cultural floorspace and public areas which would include a public space at level 35 with outdoor and indoor areas (the

Sanctuary and the Garden), an education and community room (the Learning Space), and the ground level route (the Passage). 368sqm of public realm (the Undercroft) would be provided on site at the ground floor with direct access to Gracechurch Street. The retail space and cultural offer in the elevated public space would combine to form a compelling new City destination, thus aligning with the Destination City agenda.

The proposals would optimise the use of land, delivering high quality office space towards the south west edge of the emerging City Cluster, and publicly accessible spaces. It would improve the site's interfaces with and contribution to the surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. It is considered that the proposal would constitute Good Growth by design.

### Environmental impact

The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight sunlight, wind 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. However, considering BRE Guidance, the nature of the results and the sites location within a dense urban environment, 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.

### Highways and Transportation

In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Acceptable levels of cycle parking and facilities are proposed, which would encourage active travel to the site. The scheme is in compliance with Local Plan Policy 16.3 and London Plan Policy T5. Accessible cycle parking spaces have been included in line with the requirements of London Plan, and one accessible car parking space would be provided in the Undercroft area for the users of the building in line with London Plan Policy T6. A Travel Plan would be secured via S.106 to support disabled people associated with this development through various measures. Conditions have been recommended to ensure the cycle parking would be designed in accordance with London Cycling Design Standards. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authorities and the appointed contractor, in accordance with construction regulations and logistic guidance. Servicing would take place overnight,

between 23:00 and 7:00, in the Undercroft through a booking system to be secured under management plans in the S.106 and the servicing trips proposed for the proposed mixed use development would be consolidated by 75% and this is considered acceptable with conditions and S.106 obligations recommended to secure the servicing and delivering arrangements.

### Sustainability

An options assessment was conducted with a 'retrofit first' approach in accordance with the Carbon Options Guidance and the GLA Circular Economy Guidance and concluded that the retention and retrofit of the existing building would not meet optimal sustainability and policy objectives for the site and its position in the City context. The proposed building would be designed to the highest sustainability standards and delivers key sustainability policies for the City. The proposal delivers a flexible, adaptable and high-quality office space, an improvement to the public realm, and the delivery of greening and climate resilience measures. Thus, the proposal would contribute to future proofing London against a range of environmental, social and economic challenges.

The proposal incorporates a significant element of integrated urban greening, climate resilience measures, and is targeting a BREEAM 'Outstanding' rating. It embeds circular economy principles and a whole life-cycle carbon approach to minimise both upfront and in use embodied carbon emissions. It achieves the GLA standard benchmark for commercial buildings which is recognised as a challenge for a tall building typology. The proposal would achieve high energy efficiency standards through passive design measures, this is demonstrated in targeting an ambitious NABERS UK rating of 5.5 stars. The proposal is considered to be in overall compliance with London Plan policy SI 2, SI 7, Local Plan policy CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

### Design/Heritage/Archaeology

The proposals comply with the required initial steps of archaeology investigation, in accordance with Local Plan DM 12.4, emerging City Plan 2040 HE2 and London Plan HC1, subject to an archaeology condition.

Principle of a Tall building:

The application site is considered appropriate in principle for a tall building and a full assessment of the proposal against London Plan policy D9 is set out below, which

concludes the policy would be complied with; the proposal would comply with the various requirements of Local Plan policy CS 14 and most relevant parts of emerging City Plan policies S12 and S21, although there would be some minor conflict with S12 (3) in relation to the highest point of the scheme which is slightly above the draft proposed Cluster contour lines in this location and with S21 (5) in relation to the impacts identified on the settings of designated heritage assets.

#### Views:

The proposals comply with London Plan Policy HC4, Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 and associated guidance in the LVMF SPG and Protected Views SPD. In LVMF pan-London panoramas the development would consolidate and enhance the visual appearance of the City Cluster on the skyline.

The development would preserve the experiences from public high-level viewing platforms including from Monument, St Paul's Cathedral Stone and Golden Galleries. However, it would impact the westerly views from Sky Garden at 20 Fenchurch Street, but this would be entirely mitigated by the new elevated public space proposed at level 35, which would reinstate these viewing experiences.

#### Design:

The proposal would be a striking new addition to the Cluster and would be of a dynamic and distinctive architectural character, with full details of its innovative 'fin' façade system to the south and-east areas of the tower facades secured through condition and S.106 obligation. Officers consider that the architectural design of the building would be a well-layered and unique piece of design that expands London's public realm and urban greening, through the inclusion of the Undercroft (open between 7am and 11pm), as well as making a significant beneficial contribution to the landmark qualities of the building, befitting the pivotal location of the site at the western edge of the emerging City Cluster. This is in accordance with London Plan policies Local Plan Policies CS10, DM10.1, DM10.3, DM10.4, DM10.8 and DM19.1 emerging City Plan Policies S1, S8, DE2-8, HL1, and London Plan Policies D3, D4 and D8, and relevant sections of the NPPF. The proposals would constitute Good Growth by design and be in accordance with Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 DE2 London Plan D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5,6.

#### Heritage:

The proposal would not harm the attributes or components of the Outstanding Universal Value, Significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with Local Plan Policy CS12, CS13 (3) Emerging City

Plan Policy S11, HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG.

The proposal would, via change in their settings, cause a low level of less than substantial harm to The Monument (Grade I); a low level of less than substantial harm to Tower Bridge (Grade I) and slight level of less than substantial harm (at the lowest end of the spectrum) to the Eastcheap Conservation Area. This harm has been minimised and mitigated through the design process. However, as it would fail to preserve the significance/special interest or setting of these two designated heritage assets, there would be conflict with Local Plan policies, CS12 (1 and 2), DM12.1 (1), emerging City Plan S 11 (2) and London Plan HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies. Giving considerable importance and weight to the desirability of preserving the setting of listed buildings, this harm would be outweighed by the public benefits of the scheme. Such public benefits include the delivery of growth in a highly sustainable location; the provision of an accessible public offer comprising free to access elevated public spaces, including the provision of a cultural offer in the form of a learning space at level 35; the provision of improved and accessible external public realm across the site including the Undercroft; uplift in urban greening and biodiversity; and the uplift in office floorspace with the associated creation of additional jobs, and annual worker expenditure in the emerging City Cluster and its surroundings.

### Planning judgement

It is the view of officers that as a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 complied with, and as London Plan policy D9, and Local Plan policy CS10 (Design), CS13 (Protected Views) are complied with, that notwithstanding the degree of conflict with policies CS12 (Historic Environment), DM12.1 Managing Change affecting all heritage assets and spaces), emerging City Plan Policies 2040 S11 (Historic Environment), S12 (3) (Tall Buildings), and London Plan HC1 (Heritage Conservation and Growth) , the proposals comply with the development plan when considered as a whole.

The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S.106 agreement.

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. The Local Planning Authority must determine the



application in accordance with the development plan unless other material considerations indicate otherwise.

Paragraph 10 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.

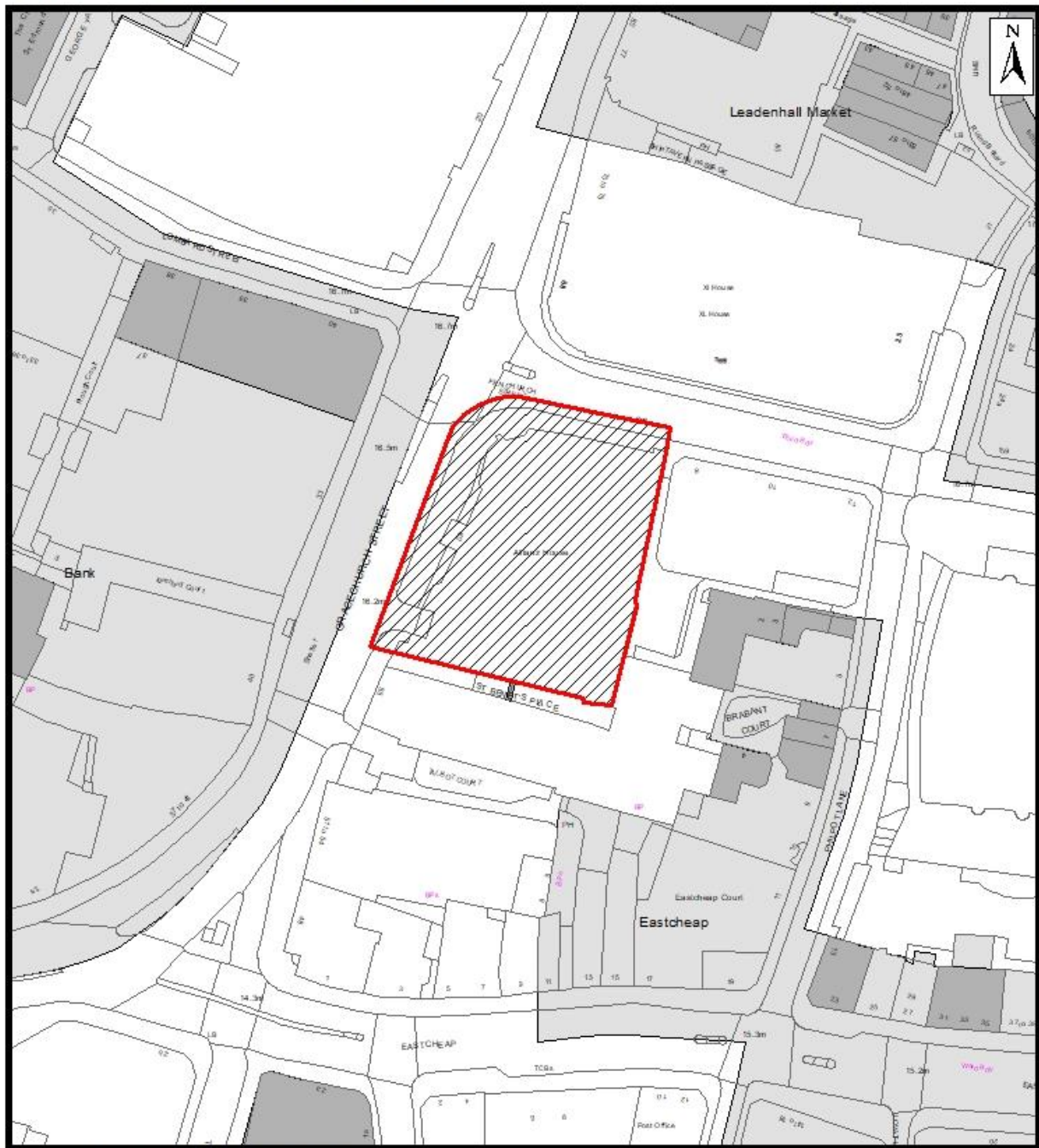
As set out in paragraph 205 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be). In addition, 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.

National Planning Guidance advises that conflict between development plan policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs as guided by the NPPF. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

## **Recommendation**

1. That 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. The planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.
2. The application being referred to the Secretary of State pursuant to the Town and Country Planning (Consultation) Direction 2021 and the application not being called in under section 77 of the Town and Country Planning Act 1990.
3. That the Department for Digital, Culture, Media & Sport (DCMS) be notified of the application and advised that the City Corporation intends to grant planning permission and that the Planning and Development Director be given delegated authority to consider any response received from DCMS, UNESCO or ICOMOS.
4. 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 agreement under Section 278 of the Highways Act 1980.
5. That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.




# Site Location Plan



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ADDRESS:  
60 Gracechurch Street

CASE No.  
24/00743/FULEIA

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



**CITY  
LONDON**

ENVIRONMENT DEPARTMENT

## SITE PHOTOS

Existing view of the site from Gracechurch Street (facing southeast)



Existing view of the site from Fenchurch Street (facing east)





Existing view of the site from Gracechurch Street (facing north)





Existing view of the site from Fenchurch Street (facing west)



Existing view of the site from Gracechurch Street (facing north) St. Benet's Place to the right hand side

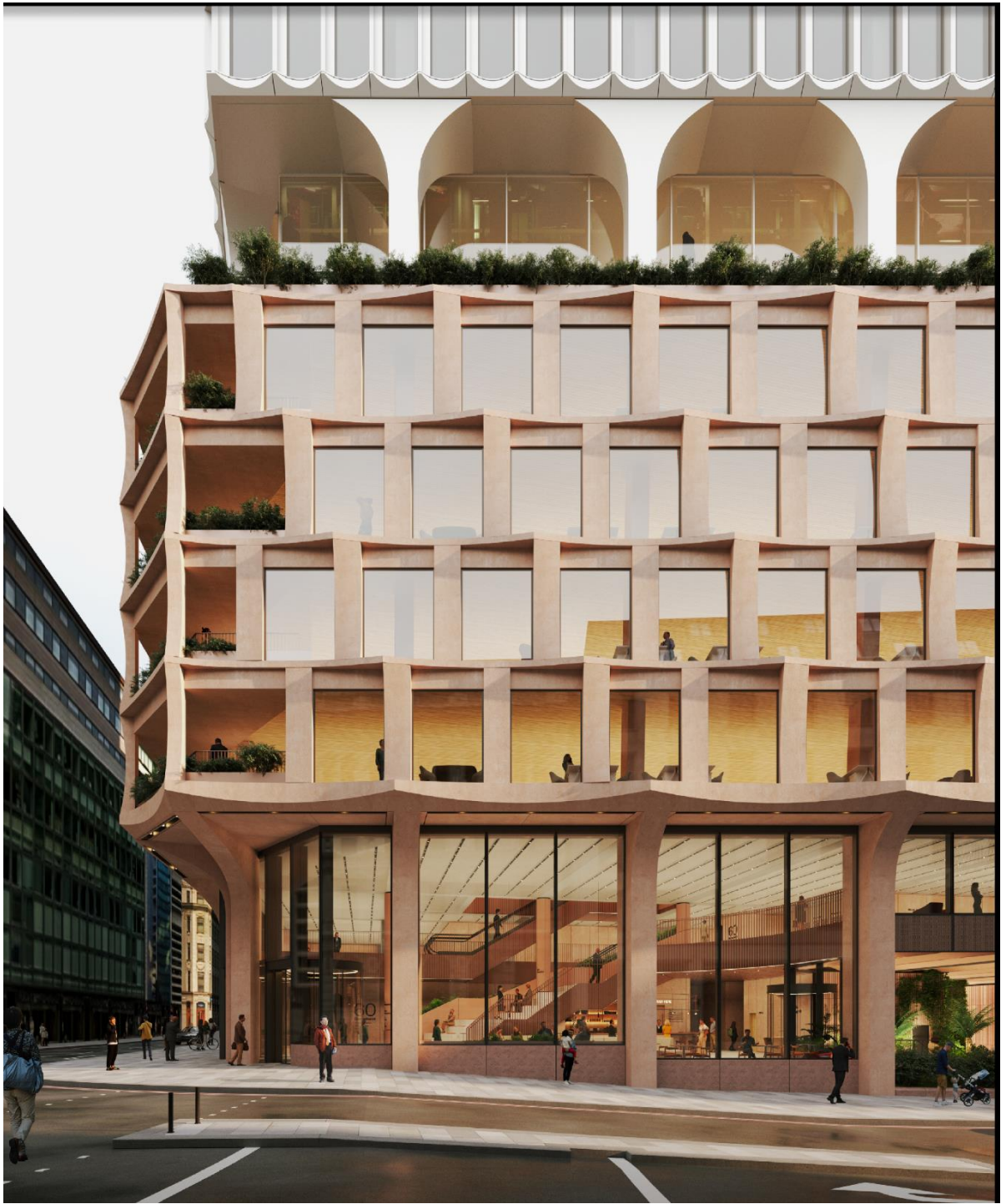




Proposed view from Gracechurch Street (facing southeast)



Proposed office entrance Gracechurch Street Elevation

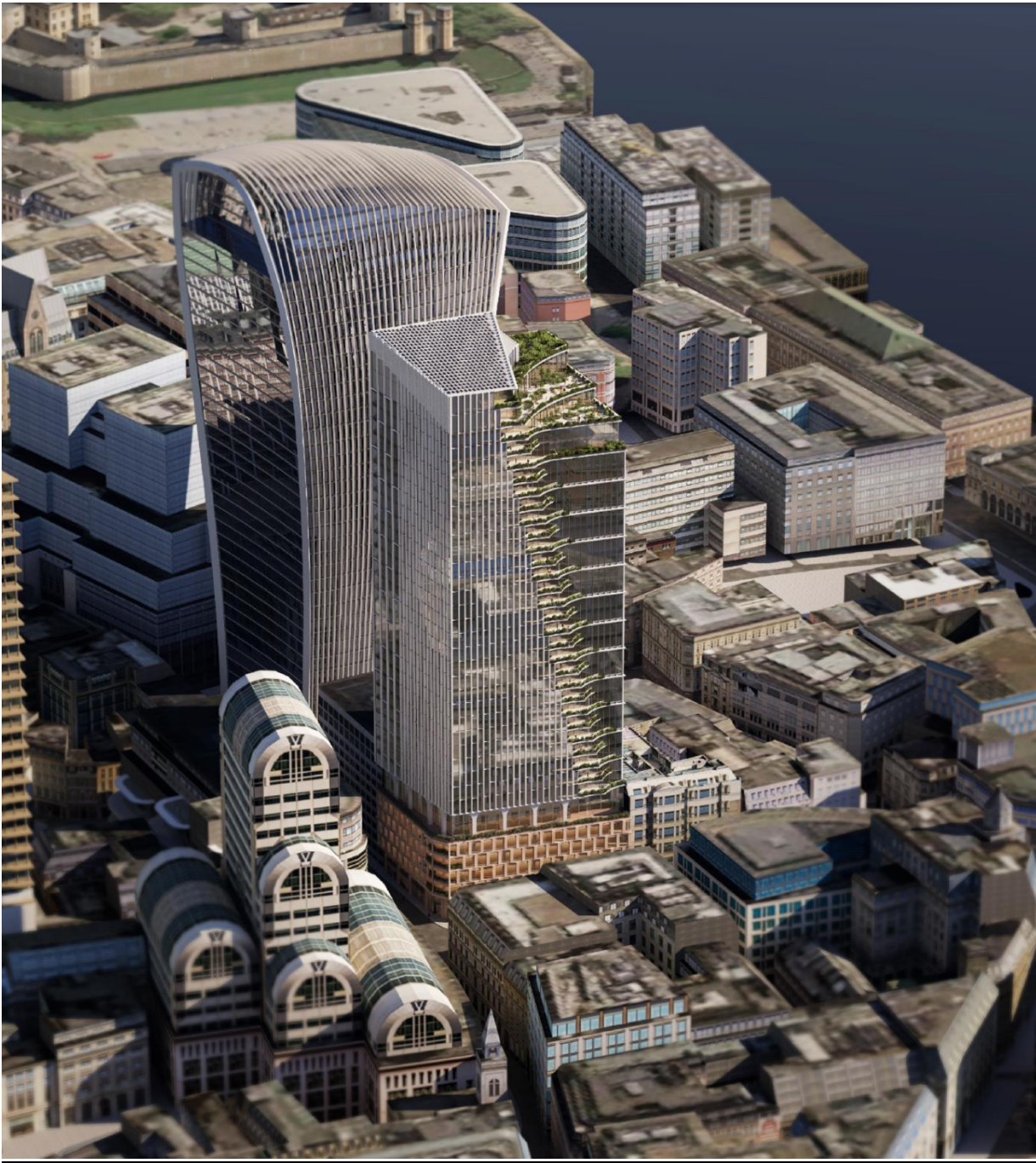




Proposed West Elevation showing the tower element



Proposed aerial view Gracechurch Street





Proposed Southern and eastern elevation from Butlers Wharf



Proposed Undercroft from Gracechurch Street



Proposed publicly accessible Roof Garden at level 35





Proposed Learning Space at level 35



# APPLICATION COVER SHEET

60 Gracechurch Street

## FACT SHEET

TOPIC	INFORMATION		
		EXISTING	PROPOSED
1. HEIGHT		56.34m	162.30m
2. FLOORSPACE GIA (SQM)		EXISTING USES (sqm) (GIA)	PROPOSED USES (sqm) (GIA)
	Office (Class E(g)(i))	13,134	52,012
	Retail (Class E)	1,076 (shop)	187 (café)
	Publicly Accessible Area on Level 35 ('the Sanctuary') and the associated corridor on at GF ('the Passage') (Sui Generis)	n/a	611
	Learning Space	n/a	83
	Ancillary (Basement/BOH)	1,948	7,745
	<b>TOTAL</b>	<b>16,158</b>	<b>60,638</b>
			TOTAL UPLIFT: 44,480 (275%)
3. OFFICE PROVISION IN THE CAZ	52,012sqm (GIA) / 54,937 (GEA) / 39,429sqm (NIA)		
4. EMPLOYMENT NUMBERS (Operational Phase)	EXISTING	PROPOSED	
	934	3,315	
5. VEHICLE/ CYCLE PARKING		EXISTING	PROPOSED
	Car parking spaces	9	0

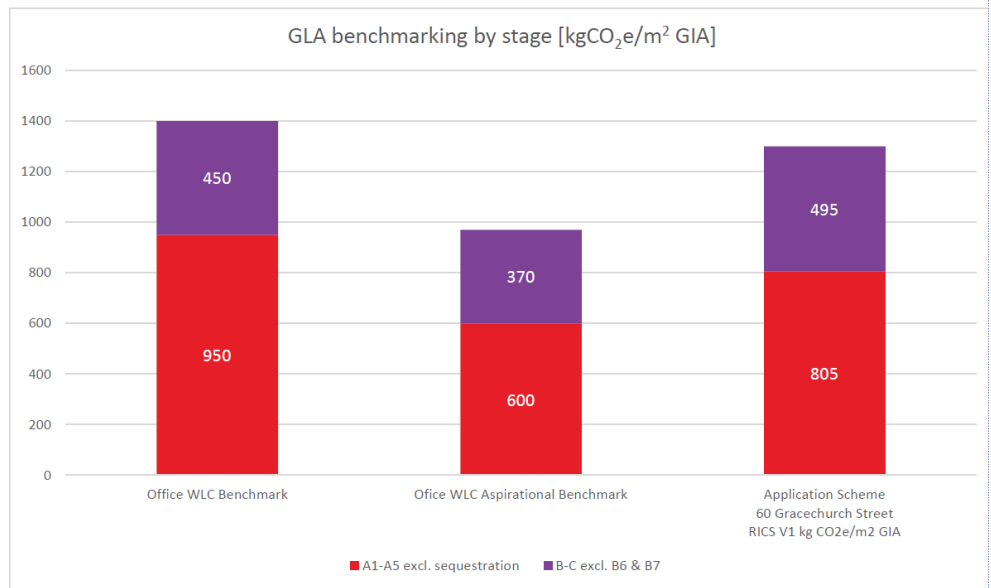
	Blue Badge Parking Spaces	0	1
	Cycle long stay	40	849
	Cycle short stay	0	41
	Lockers	113	849
	Showers	5	73
	Changing facilities	2 changing rooms	849 changing lockers
<b>6. HIGHWAY LOSS / GAIN</b>	n/a - no loss or gain		
<b>7. PUBLIC REALM</b>	368 sqm gain (on-site)		
<b>8. TREES</b>		EXISTING	PROPOSED
		0	0
<b>9. SERVICING VEHICLE TRIPS</b>	EXISTING	PROPOSED	
	29/day (off-street)	<ul style="list-style-type: none"> <li>- 117/day (off-street)</li> <li>- 32/day (with approx. 75% consolidation)</li> </ul>	
<b>10. SERVICING HOURS</b>	No existing restrictions.	23:00 to 7:00	
<b>11. RETAINED FABRIC</b>	20% retention of the existing structure (substructure and superstructure) by mass		
<b>12. OPERATIONAL CARBON EMISSION SAVINGS</b>	52% - Improvements against Part L 2013 29% - Improvements against Part L 2021 (GLA policy target 35%)		

**13. OPERATIONAL CARBON EMISSIONS**

88,860 tonnes CO<sub>2</sub>e over 60 years  
 1,465 tonnes CO<sub>2</sub>e per square meter over 60 years

**PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS**

**14. EMBODIED CARBON EMISSIONS**



Upfront embodied carbon (A1-A5) - 48,821 tCO<sub>2</sub>e / 805 kgCO<sub>2</sub>e/m<sup>2</sup>  
 In use embodied carbon (B-C, excl. B6 & B7) - 29,995 tCO<sub>2</sub>e / 495 kgCO<sub>2</sub>e/m<sup>2</sup>

**15. WHOLE LIFE-CYCLE CARBON EMISSIONS**

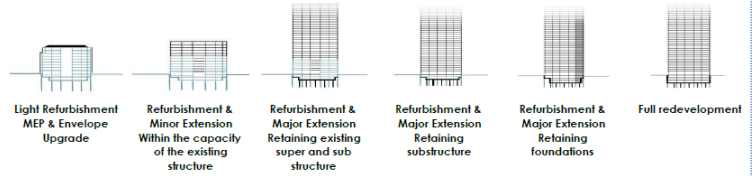
Total whole life-cycle carbon emissions: **167,673 tonnes CO<sub>2</sub>e**  
 Whole life-cycle carbon emissions per square meter: **2,765 tonnes CO<sub>2</sub>e GIA**  
 (A-C including sequestration and pre-construction demolition - RICS V1)

**16. WHOLE LIFE-CYCLE**

**CARBON OPTIONS RESULTS**



## CARBON OPTIONS



Option Reference	Scenario 2	Scenario 4	Scenario 5	Scenario 7	Scenario 8	Scenario 9
Project reference period	60	60	60	60	60	60
Gross Internal area (GIA) m <sup>2</sup>	16,051	22,906	54,857	55,469	57,074	57,549
Net Internal area (NIA) m <sup>2</sup>	11,711	16,570	34,536	34,813	35,592	35,592
Change in NIA (compared to existing) m <sup>2</sup>	0%	41%	194%	197%	203%	203%
Substructure % retained by mass	100%	100%	69%	65%	34%	0
Superstructure (Frame, Upper floors, Roof, Stairs and ramps) % retained by mass	100%	100%	57%	0%	0%	0
Total WlCA (incl. B6 & pre-demolition) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA) <i>Module B7 is not considered</i>	975	1,092	1,239	1,289	1,331	1,351
Upfront Embodied Carbon (A1-A5) excl. sequestration (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	395	540	690	730	770	790
In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7 (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	430	430	430	430	430	430
Estimated Whole Building Operational Carbon for building life time (B6) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	150	117	117	117	117	117
Total WlCA (incl. B6 and pre-demolition) (tCO <sub>2</sub> e) <i>Module B7 is not considered</i>	15,448	25,020	67,966	71,475	75,945	77,721
Total existing building demolition (tCO <sub>2</sub> e)	0	131	131	665	803	803
Upfront Embodied carbon (A1-A5) (tCO <sub>2</sub> e)	6,340	12,369	37,851	40,492	43,947	45,464
In-use embodied carbon (B-C) (tCO <sub>2</sub> e)	6,902	9,850	23,589	23,852	24,542	24,746
Operational Carbon for building life time (B6) (tCO <sub>2</sub> e)	2,406	2,670	6,395	6,466	6,653	6,709

### 17. TARGET BREEAM RATING

Score: 91.8%

Good	Very Good	Excellent	Outstanding
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Policy target: Excellent or Outstanding

### 18. URBAN GREENING FACTOR

0.33 (GLA methodology)

### 19. AIR QUALITY

- Air Quality Neutral
- Air Quality Positive

### 20. BIODIVERSITY NET GAIN

Existing = 0.00 habitat units.

Proposed = 0.45 habitat units.

## **Main Report**

### **Environmental Statement**

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the environmental information contained in the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
  - a) To examine the environmental information
  - b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
  - c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
  - d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. A Local Planning Authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The drafted statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the

proposed development and that reasoned conclusions set out in the statement are up to date.

5. Representations made by any body required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.
6. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.
7. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information.

### **Site and Surroundings**

8. The application site is located towards the southern end of Gracechurch Street, where it meets Fenchurch Street on its eastern side. It is approximately 0.22 hectare and is bound by Gracechurch Street to the west, Fenchurch Street to the north, and the adjacent building at 55 Gracechurch Street and St Benet's Place on its south and southeast side and a courtyard with the buildings at 6 - 8 Fenchurch Street and Philpot House on its east side. The site also includes an area of public highway around the perimeter of the building along Gracechurch Street and Fenchurch Street.
9. The existing building Allianz House, was built in the mid-90s to comprise 9 floors above ground and 2 below, offering 13,134sqm (GIA) of existing office floorspace and 1,948sqm (GIA) of ancillary space in the basement. One large retail unit, 1,076sqm (GIA), is situated at part ground and lower ground levels, with direct street access, extending along the full frontage of Fenchurch Street and the northwest corner of the Gracechurch Street frontage offering levels of activation to the street elevation. Entrance to the retail unit is achieved from the northwest corner of the building. The office entrance is located at the centre of Gracechurch Street, west frontage, with servicing access situated at the southern part of this elevation. There are level changes along the frontage of Gracechurch Street.

10. The street level frontage along Gracechurch Street all the way to the northwest curved corner of the building incorporates setbacks that provide public areas designated as permissive paths. Similarly, St Benet's Place is also identified as a permissive path. The frontage along Fenchurch Street falls within Leadenhall Market Principal Shopping Centre (PSC), which is an area identified as highly suitable for retail uses under the adopted and emerging Local Plan.
11. The application site is not situated within a Conservation Area and the existing building is not listed. Bank Conservation Area boundary extends along the west side of Gracechurch Street, across from the site, and to the east and south east is the boundary of Eastcheap Conservation Area. The existing building is not considered to be a Non-Designated Heritage Asset (NDHA). Part of the site falls within 'sites of additional archaeology' as identified in the City Map. There are a number of designated heritage assets in the immediate vicinity of the site which are identified and addressed below in the heritage section of the report.
12. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London is the Highway Authority and also is a Strategic Cycle Route (London Cycle Network). Fenchurch Street forms part of the City of London Highways Authority.
13. The context of the site is mixed use with retail/commercial uses on the ground and lower levels and office at upper floors.
14. The closest neighbouring residential properties to the application site are to the south-east, including one property at 4 Brabant Court, a manager's flat at the Ship Public House 11 Talbot Court four and 14 flats at 3 East House, all situated within the same block bounded by Gracechurch Street, Fenchurch Street, Philpot Lane and Eastcheap. About 100-120m to the southeast of the site are 35 flats at Botolph Alley, 92 apartments and flats at Lovat Lane, 40 flats at Monument Street, and 29 flats at St Mary At Hill. Approximately 100m to the north of the site are 3 flats at 4 Bulls Head Passage.
15. The nearest subway station is the Monument, about 120m to the southwest of the site's office entrance. The nearest train stations are Cannon Street at about 360m to the south west and Fenchurch Street Station, at approximately 470m to the east and of the site.

#### **Relevant planning history**

16. The existing building was granted planning permission on 29th November 1994 under application Ref. No. 0450AT that approved the following development:

*‘Redevelopment to provide a new office building with Class A1 & A2 retail provision and off-street servicing and car parking.’*

17. There is no further relevant planning history in connection to the site and the current planning application.
18. It is worth noting that the adjoining building at 55 Gracechurch Street was granted permission on 29th September 2021 for the following development:

*‘Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 29 upper storeys, including office use (Class E), flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis)) a public viewing gallery and garden terrace (sui generis), new pedestrian routes, cycle parking, servicing, refuse and plant areas, public realm improvements, and other works associated with the development.’*
19. However, at the time of this report, the above consent expired as the approved development did not commence within the required timeline as set out in Condition 1 of the Planning Permission (application Ref. No. 20/00671/FULEIA).

### **Proposals**

20. Planning permission under application Ref: 24/00743/FULEIA submitted to the City of London and made valid in July 2024 is sought for:
  - The demolition of the existing building at 60 Gracechurch Street with the retention of the existing basement levels;
  - The redevelopment of the site comprising the construction of a new building of ground floor plus 36 storeys (plus two retained basement levels), reaching maximum height of 162.30m AOD (146.37m AGL);
  - The use of upper floors as offices (Class E(g)) with publicly accessible retail/café (Class E(a)(b)) at ground floor, a covered accessible public realm of 368sqm at ground level with direct access to the street (the Undercroft), the use of the 35<sup>th</sup> floor as a publicly accessible roof terrace including both internal and external space (the Sanctuary and the Garden) and a flexible Learning Space;
  - Ancillary basement cycle parking and end-of trip facilities;
  - Servicing and plant;

- Highway improvements and other works associated with the proposed development.
21. The scheme would provide 60,638sqm (GIA) floor space. A schedule of these areas is shown on Table 1 as follows.

Table 1. Schedule of Areas

Schedule of Areas			
Use	sqm (GIA)		
	Existing	Proposed	Difference
Office (Class E(g))	13,134	52,012	+ 38,878
Retail / Café (Class E (a) / (b))	1,076	187	- 889
Public space (Sui Generis) (Incl. Level 35 (the Sanctuary & Garden and associated ground floor Passage)	0	611	+ 611
Leaning Space at Level 35 (Sui Generis)	0	83	+ 83
Ancillary basement and BOH	1,948	7,745	+ 5,797
<b>Total</b>	<b>16,158</b>	<b>60,638</b>	<b>+ 44,480</b>

22. The overall uplift in space would be 44,480sqm of GIA floorspace created by the redevelopment works on site. An uplift of 38,878sqm of GIA in office floorspace would be created.
23. The proposed building would be cut through horizontally to provide two distinctive architectural elements, the base of the building (referred to as the podium in the application) and the tower element. This reflects a common design approach of tall buildings in the Eastern Cluster. At the separation point, the building would create a two-storey element, referred to as 'the portico' in the application, and it would be recessed from the tower to create opportunities of external amenity space. The west tower elevation would have a diagonal cut

to create a spine of terraces that incorporate greening at every level visible from distant views. The top of the podium and the west terraces would offer private amenity spaces for the use of the office staff. As mentioned above, the terrace at level 35 would be publicly accessible and forms one of the public offers of the proposed development.

24. The main entrance would be from the corner of Gracechurch and Fenchurch Street giving entry to a large open ground floor incorporating a public café at the ground level and escalators and a central staircase, referred to in the submission as the 'amphistair', ascending to the first floor office reception. A bike entrance would be from the north of the building via Fenchurch Street with direct access to three lifts leading to the basement cycle parking and end-of-trip facilities.
25. The public realm area referred to as the Undercroft would be accessed directly from the southwest of the building through Gracechurch Street with a secondary entrance achieved through the café. The Undercroft would serve a dual purpose. During the day it would be an open public realm space serving the main entrance to the public spaces at level 35. It would incorporate public seating, short stay cycle parking and an accessible car parking. During night hours (between 23:00 and 7:00) the Undercroft would be used as a servicing area. Landscaping with seating opportunities would be incorporated within the public realm space to create a bio-friendly environment and a welcoming and calming space in a very busy location.
26. The proposed elevated public spaces, at level 35, referred to as the Sanctuary and the Garden in the application, would be accessed from the Undercroft through check in and security control points and then follow a designed passage (proposed to include informational signage on the history of the site and surrounding areas), arriving at a lift leading directly to the top. The Sanctuary and Garden would offer views to the south and west towards the Thames. The area also offers a Learning Space for school classes and community groups.

## **Consultations**

### **Statement of Community Involvement**

27. The applicant has submitted a Statement of Community Involvement (SCI) prepared by Jbp outlining their engagement with stakeholders. The consultation included sensitive neighbours, community representation, businesses and those interested in the proposed development. It involved consultation of 1,074 addresses, advertisements on social media, establishment of a 24 hour contact centre, public consultation website with contact forms, two in-person public

events over six days, four meetings with political and community stakeholders, and correspondence with local stakeholders (such as solicitors, residents and businesses).

28. The community involvement was two-phased to allow analysis of feedback from the first round of consultation and further refinements of the proposal until the second round. An in-person consultation took place in 20 Gracechurch Street over a three day period, 16-18 April 2024. A total of 55 individuals attended this event including occupiers of 20 Gracechurch Street, nearby business professionals and built environment enthusiasts. Further engagement occurred online through social media, the website and the press. Over the course of the consultation 11 feedback forms were submitted. The feedback was in the main positive and supported the proposals for new publicly accessible space within roof level and at the lower levels of the building.
29. The second phase of public consultation was held at the same event space as the first over three days, 28-30 May 2024. A total of 24 individuals attended with similar mix backgrounds as in the consultation. Over the course of the second consultation, three feedback forms were submitted from neighbouring resident and employees. The feedback was in the main positive and supported the public spaces as in the first consultation.
30. The SCI informs that some attention was given on other forms of feedback (social media channels) from local residents in Bull's Head passage objecting on overshadowing to their property. The applicant requested to meet and discuss their concerns and in response to daylight/sunlight and overshadowing studies have been submitted showing negligible impact in their property.

### **Statutory Consultation**

31. Following receipt of the application by the Local Planning Authority in July 2024, it has been advertised on site and in the press and has been consulted upon twice as follows:
  - On validation of the application in July 2024 for a period of 30 days.
  - Under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 following the receipt of further information, for a 30 day period starting on 22 October 2024. This consultation covered some revisions to the design of the scheme and the request for updated information as a consequence of the revisions, including but not limited to updates to the Environmental Statement.



32. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses are set out below.
33. The applicant has provided detailed responses to matters raised in consultee responses. The applicant's responses are attached in full and appended to, in this report.

<b>Consultee</b>	<b>Summary of comments</b>
<p><b>Health and Safety Executive (HSE)</b></p> <p>Letter dated 23.07.2024 and 22.10.2024</p>	<p>No comments.</p> <p>HSE does not identify the planning application to fall under their remit of statutory consultation, hence they do not need to provide advice.</p>
<p><b>Natural England</b></p> <p>Letter dated 26.07.2024 and 04.11.2024</p>	<p>No objection.</p> <p>Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.</p> <p>--</p> <p>Re-consultation response:</p> <p>No objection.</p> <p>Natural England has previously commented on this proposal and made comments to the authority in our response dated 26 July 2024 reference number 483338. The advice provided in our previous response applies equally to this amendment. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.</p>
<p><b>Environmental Agency</b></p> <p>Letter dated 29.07.2024 and 23.10.2024</p>	<p>No comments.</p> <p>The following advice has been provided:</p>

	<p>Water Resources</p> <p>Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments. We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption. We also recommend you contact your local planning authority for more information.</p> <p><b>Officer response:</b> An informative has been recommended.</p>
<p><b>Crossrail Safeguarding Direction</b></p> <p>Letter dated 26.07.2024 and Email dated 25.10.2024</p>	<p>No comments.</p>
<p><b>NATS Safeguarding</b></p> <p>Email dated 26.07.2024 and Email dated 22.10.2024</p>	<p>NATS has assessed the application and has identified an unacceptable impact upon its H10 radar located at Heathrow Airport. NATS advised that should the LPA be minded to grant the scheme, NATS respectfully requests the imposition of conditions on any planning permission requesting a Radar Mitigation Scheme (RMS) to be submitted and approved prior to construction works which shall be implemented before construction above 100m AOD is carried out and the submission of a "Crane Operation Plan" prior to construction works to be agreed in consultation with the "Radar Operator".</p> <p>NATS comments remained unchanged from the above, following re-consultation.</p>

	<b>Officer response:</b> Conditions are recommended.
<b>TfL Infrastructure Protection</b>  Email dated 26.07.2024	No comments.
<b>Greater London Archaeological Advisory Service (GLAAS)</b>  Letter dated 01.08.2024 and 05.11.2024	<p>In summary GLAAS has no objections subject to a written scheme of investigation (WSI) condition and an informative explaining what the WSI should be prepared. This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 211.</p> <p>In detail GLAAS made the following comments:</p> <p><u>Assessment of Significance and Impact</u></p> <p>The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.</p> <p>An archaeological desk-based assessment (MOLA 2024) has been submitted with the planning application. The DBA highlights that although archaeological remains of Roman and medieval date have previously been found on the site in 1959 and 1995, the current basements are likely to have removed all but the deepest cut features. The proposed development entails extending Basement 2 into a previously undisturbed area in the south-east of the site. However, this area has already been truncated by the construction of Basement 1. As there is some potential for deep cut archaeological remains to survive in this area, a watching brief during ground reduction is recommended.</p> <p><u>Planning Policies</u></p>

	<p>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.</p> <p>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.</p> <p>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.</p> <p><u>Recommendations</u></p> <p>The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.</p> <p><b>Officer response:</b> Condition and informative are recommended.</p>
<p><b>Lead Local Flood Authority (LLFA)</b></p> <p>Letter dated 01.08.2024</p>	<p>Conditions recommended requiring further details of SuDs system, flood prevention measures and a maintenance plan.</p> <p><b>Officer response:</b> Conditions are recommended.</p>
<p><b>Westminster</b></p> <p>Letter dated 05.08.2024</p>	<p>No comments.</p>
<p><b>Heathrow Airport</b></p> <p>Letter dated 07.08.2024 and 24.10.2024</p>	<p>Heathrow Airport examined the proposed development from an aerodrome safeguarding perspective and advised it could conflict with safeguarding criteria. They have advised that any planning permission granted should be subject to conditions including and requesting a Radar Mitigation Scheme (RMS) to be submitted and approved prior to construction works which shall be implemented</p>

	<p>before construction above 100m AOD is carried out and the submission of a “Crane Operation Plan” prior to construction works to be agreed in consultation with the Radar Operator”. If these conditions are not imposed to any future planning permissions, Heathrow Airport would object to this proposal.</p> <p>Heathrow Airport would also like to notify the developer of the Civil Aviation Authority (CAA) notification processes if any part of the development exceeds 91.4m AGL, upon grant of permission, and the CAA crane notification requirement when a crane exceeds 100m or above.</p> <p>--</p> <p>Heathrow Airport’s comments remained unchanged from the above, following re-consultation.</p> <p><b>Officer response:</b> Conditions and informatives are recommended.</p>
<p><b>Thames Water</b></p> <p>Email dated 09.08.2024 and Email dated 20.11.2024</p>	<p>Waste comments</p> <p>Thames Water has raised no objections and has requested conditions to be included to require a piling method statement and a piling layout plan.</p> <p>Thames Water advises that any significant work near their sewers must minimize the risk of damage. Works should be guided in accordance with the Thames Water ‘guide working near or diverting our pipes’.</p> <p>As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions.</p> <p>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. They would</p>

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](mailto:trade.effluent@thameswater.co.uk).

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.

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. For further information the developer should refer to [Help and advice | Help centre | Thames Water](#).

With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available, As such, Thames Water recommend a condition to be imposed if planning permission is granted to request a confirmation that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water, prior to occupation of the development. 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, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. The developer can request information to

	<p>support the discharge of this condition by visiting the Thames Water website at <a href="http://thameswater.co.uk/preplanning">thameswater.co.uk/preplanning</a>.</p> <p>With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available. As such Thames Water request that a condition be added to any planning permission requesting confirmation that either:-</p> <ol style="list-style-type: none"> <li>1. Surface water capacity exists off site to serve the development or</li> <li>2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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. Or</li> <li>3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. The developer can request information to support the discharge of this condition by visiting the Thames Water website at <a href="http://thameswater.co.uk/preplanning">thameswater.co.uk/preplanning</a>.</li> </ol> <p>Water comments</p> <p>Thames Water has raised no objections and has requested conditions to be included to require a piling method statement and a piling layout plan.</p> <p>The proposed development is located within 15m of a strategic water main. Thames Water do NOT permit the building over or construction within 3m of water mains. If the development will include significant works near Thames Water's mains (within 3m) they will need to check that the development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services they provide in any other way. The applicant is advised to read Thames Water guide working near or diverting their pipes <a href="#">Working near our pipes   Developer services   Thames Water</a>.</p> <p>The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water</p>
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	<p>mains. Thames Water request that a condition be added to any planning permission requesting information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure.</p> <p>Thames Water recommends an informative to be attached to any planning permission saying that 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>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. As such Thames Water request that the a pre-occupation condition be added to any planning permission requesting confirmation 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. The developer can request information to support the discharge of this condition by visiting the Thames Water website at <a href="http://thameswater.co.uk/preplanning">thameswater.co.uk/preplanning</a>.</p> <p>Supplementary comments</p> <p>Thames Water states they are unable to identify an accessible discharge point that serves the site. The only point of discharge from the site is a 305mm combined connection in St Benet's Place (TQ32809802B) which does not have the capacity to serve this development. Thames Water requested that the applicant confirms points of discharge (by manhole) for both Foul &amp; Surface Water.</p> <p>--</p> <p>Following re-consultation of this application, the following comment was received TW advised that "<i>with regard to</i></p>
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	<p><i>the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided”.</i></p> <p><b>Officer response:</b> Responses to TW last requirement have been sought by Officers and applicant’s responses have been shared with TW, who then confirmed there is sufficient capacity for waste water. Therefore all conditions, other than those referring to capacity water, and informatives in TW response are recommended.</p>
<p><b>London City Airport</b></p> <p>Letter dated 09.08.2024 and 23.10.2024</p>	<p>London City Airport assessed this proposal from an aerodrome safeguarding perspective and advised it has the potential to conflict with London City Airport’s safeguarding criteria. London City Airport have advised that any planning permission granted should be subject to conditions including and requesting a Radar Mitigation Scheme (RMS) to be submitted and approved prior to construction works which shall be implemented before construction above 100m AOD is carried out and the submission of a “Crane Operation Plan” prior to construction works to be agreed in consultation with the Radar Operator”. A condition for a Permanent Obstacle Lighting Scheme is also recommended to avoid endangering the safe environment of aircraft and the operation of the London City Airport.</p> <p>London City Airport would also like to notify the developer of the Civil Aviation Authority (CAA) notification processes if any part of the development exceeds 91.4m AGL, upon grant of permission, and the CAA crane notification requirement when a crane exceeds 100m or above.</p> <p>--</p> <p>Following re-consultation of this application, London City Airport responded with the same recommendations as above. The position remained unchanged.</p> <p><b>Officer response:</b> Conditions and informatives are recommended.</p>
<p><b>Historic England</b></p> <p>Letter dated 12.08.2024</p>	<p>Historic England responded on 12.08.2024 providing the following comments:</p>

and  
Letter dated  
20.11.2024

## Summary

Historic England is particularly concerned about the harm to the significance to St Mary Woolnoth that would be caused by the proposed development, as seen in views as one approaches it from the west. Such harm could be avoided or minimised by a reduction in height which would bring the proposals in line with the height of neighbouring consented schemes, and by simplifying the façade design. We therefore strongly encourage you to explore such amendments. The potential harmful impact of the proposals on other highly designated heritage assets, including the Monument and the Tower of London World Heritage Site also need to be carefully considered, particularly in a scenario when other consented developments are not built. Any conclusions on the impact on the OUV of the World Heritage Site need to be substantiated by a Heritage Impact Assessment using the appropriate methodology, which may indicate further opportunities to avoid or minimise harm.

## Historic England Advice

### Significance of the heritage assets

#### a) The Church of St Mary Woolnoth & Bank Conservation Area

St. Mary Woolnoth was completed in 1727 in the English Baroque style and represents one of the most distinctive and original designs of its architect Nicholas Hawksmoor. It has an unusually imposing façade, which is dominated by two distinctive flat-topped turrets supported by Corinthian columns, a great illustration of Hawksmoor's skill in manipulating mass, Classical detail and sculptural forms to achieve a dramatic effect. The church is grade I listed indicating its exceptional historic and architectural interest. It was designed to have a dominant and imposing presence - an appreciation of its architectural effect is reliant on its setting, including the relative scale of surrounding buildings and clear sky backdrop. It is located within the Bank Conservation Area, covering the heart of the historic financial district, to which it makes a major positive contribution. The area is centred on Bank junction and encompasses the major thoroughfares of Poultry and Cornhill. The character of the area is defined by high-quality nineteenth century and early twentieth century

commercial buildings, many of which are listed. 1 Cornhill (grade II) is one such example - its dome 'makes the principal accent of the principal crossing of the City', as described in *The Buildings of England*. The City Cluster already appears prominently in views looking east from the junction and dominates the scale of the listed buildings in the foreground. Many of these were designed to have landmark qualities; the impact of the visually dominant cluster is distracting and therefore cause some harm to the ability to appreciate their significance. However, existing views to the south east are less affected and may therefore be more vulnerable to adverse change. 20 Fenchurch Street is the only existing tall development which appears in the backdrop; 55 Gracechurch Street would additionally appear if constructed, albeit at a lower height.

b) The Monument

The Act for the Rebuilding of the City of London, passed in 1667, stipulated a monument to the Great Fire, that was to be stone column or pillar. Sir Christopher Wren and his Chief Assistant, Dr Robert Hooke, collaborated on the design - a colossal Doric column on a tall pedestal with a cupola and ornament sitting on the capital above. It was erected 1671-7 and is one of the City's most significant landmarks. Public monuments pre-dating the Georgian period are particularly rare and reflect the arrival of Renaissance modes of commemoration to Britain. At the time of its construction it was the tallest isolated stone column in the world, and as such is an important feat of both engineering and architectural accomplishment. The structure is grade I listed and a scheduled monument. It was designed to have a dominant and imposing presence - an appreciation of its architectural effect is reliant on its setting, including the relative scale of surrounding buildings and clear sky backdrop. Its dominance and wide-ranging visibility have been diminished by modern development, leaving the remaining good quality views of it particularly vulnerable to further detrimental change. One such view is from outside the Church of Saint Magnus the Martyr, looking north up Fish Street Hill. This street was once on the alignment of Old London Bridge and would have been a well-known view of the Monument at the point where one entered the City on the historically important processional route from the south.

c) The Tower of London World Heritage Site

The Tower's attributes, as defined in the adopted WHS Management Plan (2016) convey its Outstanding Universal Value (OUV). They reflect the Tower's role as the setting of many significant episodes of European history and as a model example of the development of a medieval fortress palace. It is an iconic landmark and symbol of London which sits at the heart of our national and cultural identity. The Tower of London is a monument of exceptional historic and architectural importance as reflected in its multi-designation as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area. The Tower's landmark siting and visual dominance are key aspects of its significance and adverse impacts on these will affect the integrity of the World Heritage Site. These elements of significance, as experienced through views into, within and out of the property are increasingly vulnerable due to tall buildings in the City and additional development has the potential to compound this harm.

d) Tower Bridge

With its distinctive form and silhouette, the Sir Horace Jones's nearby Tower Bridge from the late 19th century is both an engineering marvel and an internationally recognised symbol of London. On its approach from the east its structure creates the sense of a portal framing entry into central London.

Impact of the proposals

The proposals are for the replacement of the existing building on the site with a new tall building designed by 3XN Architects. It would be of a similar scale to adjacent developments - slightly shorter than 20 Fenchurch Street and slightly taller than consented developments either side at 55 Gracechurch Street and 70 Gracechurch Street. These developments have, or would once constructed, contribute to harm to multiple highly graded heritage assets (particularly those referred to above) by increasing the visual dominance and distraction of the Cluster in their settings. The current proposals would be largely occluded or framed by these existing and consented developments when seen in conjunction with them, but at the height proposed would introduce some new visual impacts.

Those that are of most concern to us are set out below. The consented development at 55 Gracechurch Street (20/00671/FULEIA) is a material consideration - but if it is not built out, the current proposals would have similar harmful impacts as those previously identified in our letter of objection to that application.

a) St Mary Woolnoth and the Bank Conservation Area

The church's significance through the contribution of its setting, as appreciated in views from Bank junction, would be harmed, as would the character and appearance of the Bank Conservation Area. The proposed development would appear taller than 20 Fenchurch Street, and would be closer to the viewpoints around the junction, increasing its dominance and distracting effect on the listed buildings in the foreground. The detailed design of the proposals, with visually striking ladder of the terraces all the way up the building on its eastern elevation, would compound this impact. Existing Cluster buildings are typically plainer in character with unmodulated glass-curtain walls that are less of a visual distraction. The best locations to appreciate St Mary Woolnoth are slightly closer, from the northern end of King William Street. The proposals would introduce a new harmful impact to the skyline in reducing the clear sky backdrop to the church's distinctive tower. This would detract from the ability to appreciate its architectural qualities and as a landmark building. The applicants own Heritage and Townscape Visual Impact Assessment has found harm to the listed building due the impact illustrated in View 6.

b) The Monument

In a cumulative scenario, the proposals would largely be occluded by 55 Gracechurch Street, which appears slightly taller due to being closer to the viewpoint in front of St Magnus the Martyr. If 55 Fenchurch remains unbuilt, the proposals would appear directly behind the column of the Monument up to the height of the capital and viewing gallery. This effect would diminish in a kinetic experience moving north along Fish Hill Street, but one would still be left with an impression of the Monument being dwarfed by its context, which runs counter to its intended purpose. The applicants own assessment also concludes that harm

	<p>to the significance of the listed building and scheduled monument would be caused.</p> <p>c) The Tower of London World Heritage Site</p> <p>In a cumulative scenario, the proposals would largely be hidden by 20 Fenchurch Street and 55 Gracechurch Street (if constructed) in views of and from the World Heritage Site. It would slightly add to the bulk and density of the Cluster and could result in an adverse impact on attributes forming the OUV of the World Heritage Site. Those attributes include its Physical Dominance, its appreciation as an Internationally Famous Monument and its Landmark Siting. If the latter development is not built, the current proposals would increase the visual dominance of the Cluster in a similar way to the approved scheme for 55 Gracechurch Street, albeit more of the development would be behind 20 Fenchurch Street in most views.</p> <p>d) Tower Bridge</p> <p>When viewing Tower Bridge from Butler’s Wharf looking upstream towards 20 Fenchurch and 55 Gracechurch Street would be prominently visible in the backdrop of Tower Bridge, framed by the bridge’s iconic form. If the latter development is not built, the current proposals would add considerable additional built form to this framed view and further reduce the amount of clear sky within the space between the two towers and upper and lower decks of the bridge that allows the unique form of the bridge to be appreciated and understood. The proposals would therefore add some harm to the considerable harm already caused by the presence of No. 20 Fenchurch Street to the significance of Tower Bridge through development within its setting, albeit less than 55 Gracechurch Street would.</p> <p>Relevant Policy and guidance</p> <p>a) The City of London Plan 2015 – 2026</p> <p>Policy CS12: Historic Environment, seeks the “safeguarding [of] the City’s listed buildings and their settings” and “Preserving and, where appropriate, seeking to enhance the Outstanding Universal Value...of the</p>
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	<p>Tower of London World Heritage Site and its local setting.”</p> <p>Policy CS13: Protected Views, aims “to protect and enhance significant City and London views of important buildings, townscape and skylines...by...securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, so ensuring its OUV.”</p> <p>Policy CS14: Tall Buildings, states that such development will only be permitted on sites that 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. The Policy indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas.</p> <p>b) The London Plan 2021</p> <p>London Plan Policy HC1 Heritage conservation and growth requires development proposals affecting heritage assets and their settings to conserve their significance. It further requires the cumulative impacts of incremental change to be actively managed.</p> <p>London Plan Policy HC2 World Heritage Sites, requires development proposals in the setting of WHSs to conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes. It additionally requires development within the setting of a WHS to be supported by a Heritage Impact Assessment.</p> <p>London Plan Policy D3 requires all development to follow a design-led approach that optimises the capacity of sites, including consideration of design options to determine the most appropriate form of development that responds to a site’s context.</p> <p>London Plan Policy D9 Tall Buildings requires that proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their</p>
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settings. Proposals resulting in harm will require clear and convincing justification. Where the proposals concern the setting of a World Heritage Site, the Policy reserves the strongest protection, stating that new tall buildings “must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it”.

c) The National Planning Policy Framework (NPPF)

The NPPF requires planning policies and decisions to reflect relevant international obligations and statutory requirements (Paragraph 2). This includes those obligations under the 1972 World Heritage Convention which require that the UK Government protects and conserves the World Heritage within its territory.

Chapter 16 of the NPPF concerns the historic environment. Paragraph 195 notes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. It recognises that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

A robust and proportionate understanding of the significance of any affected heritage assets is required and this should be taken into account in order to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a development proposal (Paragraphs 200-201).

If harm is deemed to be less than substantial, paragraph 208 of the NPPF requires that harm be weighed against the public benefits of the proposals. Great weight should be given to the conservation of designated heritage assets, irrespective of the level of harm caused, and the more important the asset, the greater the weight should be (Paragraph 205). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (Paragraph 206).

Chapter 12 of the NPPF considers good design as a key aspect of sustainable development. Paragraph 135 requires that developments should be sympathetic to local character and history, and Paragraph 193 states that development that is not well designed should be refused

permission, especially where it fails to reflect local and government design guidance. Related to this, the National Design Guide (NDG, 2021) emphasises the importance of heritage and context when considering the merits of a design.

d) The Setting of Heritage Assets Historic Environment  
Good Practice Advice in Planning Note 3 (GPA3)

GPA3 recommends a staged approach to understanding impacts on setting. Step 3 of this guidance requires an assessment of the effects of proposed development on significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided, including:

§ Proximity to asset

§ Position in relation to key views to, from and across

§ Prominence, dominance or conspicuousness

§ Competition with or distraction from the asset

§ Dimensions, scale and massing § Materials (texture, colour, reflectiveness, etc) § Change to skyline, silhouette

§ Lighting effects and 'light spill'

Historic England's position

The proposals would cause harm to highly valued features of the historic City. In each case the harm would be less than substantial in the language of the NPPF, and relatively low in the range. However, this harm would occur to heritage assets of the highest significance and therefore attracts the greatest possible weight. We are therefore unable to support the proposals in their current form.

The City's adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City's historic environment and its skyline, including the OUV of the Tower. Similarly, the London Plan provides for a robust protection of significance, including OUV in policies HC1 and HC2. All of these policies indicate the need to

	<p>carefully manage the cumulative impacts of incremental change.</p> <p>We are concerned about the new harmful impacts that would be caused to the significance of the Grade I listed Church of St Mary Woolnoth, as appreciated in some of the best views of it from the west. Such harm could be avoided or minimised by a reduction in height which would bring the proposals in line with the height of neighbouring consented schemes, and by simplifying the façade design. We therefore strongly encourage you to explore such amendments.</p> <p>Any conclusions on the impact on the OUV of the World Heritage Site need to be substantiated by a heritage impact assessment using the appropriate methodology, which may indicate further opportunities to avoid or minimise harm. The application submission does not adequately assess the impact on attributes of OUV and this must be undertaken in order to comply with the requirements of Para 200 of the NPPF and Policy HC2 of the London Plan.</p> <p>The Operational Guidelines for the Implementation of the World Heritage Convention (2023) advise that a Heritage Impact Assessment (HIA) is essential for all interventions, including development projects, that are planned within or around a World Heritage property (paragraphs 110, 118bis). Specific guidance on the HIA process has been produced: UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022). This explains how a HIA can be used iteratively throughout the design process as a tool to identify how a proposal might affect a property's attributes, its integrity and authenticity, and how any negative effects might be avoided.</p> <p>UNESCO's World Heritage Centre has recently requested that the UK Government submit a report about the WHS' State of Conservation by 01 December 2024. This request was prompted by concerns about the cumulative impact of tall building development within the Tower of London's setting.</p> <p>In the context of this heightened international scrutiny we would urge you to request a proportionate heritage impact assessment, guided by UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context</p>
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(2022). This will address the UK's obligations under the World Heritage Convention as implemented in line with the Operational Guidelines (paragraphs 110 and 118bis), and will assist in confirming the extent of any potential impacts in relation to attributes of the World Heritage Site's OUV to inform determination of this application.

**Recommendation**

Historic England has concerns regarding the application on heritage grounds. We would welcome the opportunity to discuss ways of avoiding or minimising the harm we have identified above. A modest reduction in height would potentially resolve some of our key concerns because it would likely remove or reduce new harmful impacts.

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention, as soon as a proportionate Heritage Impact Assessment is available. Historic England would recommend that any decision on this application be deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

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.

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.

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Historic England responded on 20.11.2024, following re-consultation, providing the following comments:

### **Summary**

Historic England is concerned about the harmful impact of the proposals on the significance of St Mary Woolnoth, the Monument and the Tower of London World Heritage Site (WHS).

We have previously advised that such impacts need to be carefully considered, particularly in a scenario when other consented developments are not built. We understand that 55 Gracechurch Street, which was a key consideration in the design of these proposals and the cause of similar harmful impacts, is now no longer a live consent, which changes the baseline.

A Heritage Impact Assessment (HIA) for the WHS has now been submitted. We have some methodological concerns and we do not agree with its conclusions. The proposals would cause some harm to multiple attributes of the Tower's Outstanding Universal Value (OUV) and contribute to a greater harmful cumulative impact.

### **Historic England Advice**

We have set out our position on these proposals in detail in our letter of 12 August 2024 and continue to refer you to this advice. A Heritage Impact Assessment for the Tower of London World Heritage Site has been submitted following this advice. In light of this new information we offer the following comments.

The submitted HIA argues that the Concentric Defences attribute of OUV relates wholly to the physical fabric of the Tower of London. We disagree and consider that setting makes an important contribution to how the defences can be appreciated. The WHS Management Plan notes the visual linkage of the wall-walks with the surrounding cityscape and river as a key component of this attribute.

We think that there would be some harm to this attribute, further to the Tower's Physical Dominance, its appreciation as an Internationally Famous Monument and

its Landmark Siting. This harm would arise because of the bulkier and more distracting form of the cluster when seen in relation to the Tower in cross river views. It would also negatively impact views from the Inner Ward of the Tower where it would increase the amount of modern development encroaching on the historic buildings in the foreground.

A further view has been provided in the HIA - south of the Tower on the north riverbank (Figures 6.8 and 6.9). We think that this view demonstrates some further harm. The encroachment of the proposals on the WHS as viewed from this area would harm an appreciation of the Concentric Defences and Landmark Siting attributes of OUV. The proposed building would impinge on the silhouette of St Thomas's Tower, presenting a visually dominating and distracting form.

The updated visualisations in the submitted Heritage Impact Assessment do not include 55 Gracechurch Street in the cumulative scenarios. We understand that this is because the consent is no longer live and is therefore not a material consideration. Whilst our previous advice already considered that the proposals would cause harm to attributes of OUV, the new baseline clarifies the harmful impact. These proposals would contribute further harm to the negative cumulative impact of tall buildings in the cluster, particularly owing to its scale and exposed position at its southern edge.

This development would cause a relatively low level of less than substantial harm in the language of the NPPF, but to an asset of the greatest significance. Furthermore, it would contribute to the erosion of the contribution made by setting to the ability to appreciate the World Heritage Site's attributes of OUV. This contribution is already vulnerable to the cumulative impact of new tall development.

ICOMOS, as adviser to the World Heritage Committee, has previously stated that 'the cumulative effect of existing buildings, planning proposals that are pending and proposals that have received consent but are not yet built is already severe' (Bury House Technical Review, 20/00848/FULEIA) and that 'integrity of the World Heritage property the Tower of London has already

reached its limit in terms of visual impact (Land adjacent to Bury Street Technical Review, 18/01213/FULEIA).

We note that ICOMOS's comments in these cases concerned developments at the eastern edge of the cluster. The impact of the current proposals, at the opposite edge of the cluster, would be different, but would contribute to the overall negative cumulative impact of the cluster as described above. We therefore advise that you take ICOMOS's concerns about the overall cumulative impact of the cluster seriously when considering the impact of these proposals. This is particularly important in the in the context of the current heightened international scrutiny regarding the property. UNESCO's World Heritage Centre has recently requested that the UK Government submit a report about the WHS' State of Conservation by 01 December 2024. This request was prompted by concerns about the cumulative effect of tall building development within the Tower of London's setting.

Lastly, we query the materiality of the exposed southern elevation, which would be formed of predominantly metallic cladding comprised of aluminium fins and fascias. This could have a bright reflective quality, even if it has a matt finish. This may not be accurately depicted in the submitted visualisations and we suggest requires careful scrutiny to ensure that the proposed building would not unintentionally leap out from the cluster. This could increase the harmful impacts we have already flagged. As a largely blind façade, we question whether the design quality is sufficient given the prominence it would have.

**Recommendation**

Historic England has concerns regarding the application on heritage grounds. We recommend that amendments are sought to avoid or minimise the harm to the heritage assets of the highest possible significance, including a reduction in height and review of the materiality of the southern façade.

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has



	<p>therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee’s Operational Guidelines for the Implementation of the World Heritage Convention. Historic England would recommend that any decision on this application be deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee’s Advisory Bodies has been received.</p> <p>In determining this application you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.</p> <p>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.</p> <p><b>Officer response:</b> The matters in the Historic England comments are addressed in the Tall Building, Architecture, Urban Design and Public Realm, Heritage and Strategic Views sections of this report.</p>
<p><b>London Borough of Tower and Hamlets (LBTH)</b></p> <p>Letter dated on 14.08.2024 and Letter dated on 20.11.2024</p>	<p>LBTH objects to the proposed development due to the harm cause to the setting of the Tower of London and makes the following comments:</p> <p>These proposals are for a new office-led tall building development on the intersection of Gracechurch Street and Fenchurch Street. The site is within the Easter (City) Cluster and within London’s Central Activities Zone (CAZ).</p> <p>The Councils’ main considerations in respect of this application is the impact on the setting of the Tower Of London, World Heritage Site. The development will also likely be viewed from other locations within Tower Hamlets including The Tower Conservation Area.</p> <p>The assessment should have regard to relevant LBTH guidance such as the following: Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020), Urban Structure and Characterisation Study (2009) and its</p>

	<p>Addendum (2016) and other relevant guidance, such as Conservation Area appraisals, design guides, supplementary planning documents and the Tower Hamlets Conservation Strategy.</p> <p>In the submitted supporting document for the application, ES Volume II: Townscape Heritage and Visual Impact Assessment July 2024, the impact of the proposed building on different views of and from Tower Bridge and Tower of London, is demonstrated. In views 9, a wireline is used to demonstrate the proposed development in the backdrop of the bridge.</p> <p>Development within the existing tall building cluster of the City of London is clearly visible within the setting of the World Heritage Site as seen in views 11 and 12. The impact on the Tower must be given special attention commensurate to its important designation. The Tower should not be dominated by new development close to it.</p> <p>City of London Corporation should consider whether these should also be provided as rendered views, as the Proposed Development is clearly visible alongside the massing of existing developments in the area. This is of even further importance as views 10 and 11 would experience a significant effect during operational development.</p> <p>Additionally, it is unfortunate that the Applicant has not taken into account and provided the visibility from LBTH Borough Designated View 2 from Wapping Wall bridge to St Paul's Church (as shown in Figure 6 of Tower Hamlets Local Plan 2031), as requested in the LBTH consultation response to the Scoping Opinion Request.</p> <p>In summary, the proposed building would exacerbate the existing harm caused to the setting of the Tower of London, and numerous other heritage assets within its context, by the tall buildings which form the city cluster. The proposal would expand the width of the cluster and therefore its perceived mass in the setting of the Scheduled Ancient Monument. We therefore object to the proposal due to the harm cause to the setting of the Tower of London.</p> <p><b>ES Statement:</b></p>
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LBTH were previously consulted upon and provided a response to the EIA Scoping Opinion Request for the subject application site in June 2024. LBTH consultation responses to the Scoping Opinion Request have been referenced below where relevant.

With reference to Schedule 4(2) of the EIA Regulations, the ES includes an assessment of alternatives and design evolution in Chapter 3. Whilst LBTH expected to see more explicit reference to the consideration of alternative scale and massing when it comes to effects on the Tower of London World Heritage Site and Scheduled Monument, and Tower Bridge Grade I listed building and their settings, it has been noted that consideration to these receptors has been given through LVMF views as noted in paragraph 3.15 of Chapter 3.

The Environmental Statement (ES) concluded that the following aspects and matters that could affect LBTH will result in insignificant residual effects: Air Quality, Noise and Vibration, Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, Wind Microclimate, Climate Change, Heritage, Townscape and Visual Impact Assessment.

In the consultation response to the Scoping Opinion Request, LBTH listed cumulative schemes within their jurisdiction which should be taken into account in the assessments. It is unfortunate to see that none of those have been considered.

A Heritage, Townscape and Visual Impact Assessment (HTVIA) has been provided within Volume 2 of the ES. The HTVIA follows an unusual format given that the effects during demolition and construction are provided in Chapter 7, before even understanding the baseline and scoping process of the relevant receptors.

The assessment concludes a minor adverse effect during demolition and construction and minor neutral effect during operational development on the Tower of London WHS, listed buildings within and the Tower Conservation Area. LBTH considers that the Applicant should have provided an assessment on each receptor so the residual effects can be clearly understood for distinct receptors and designations, however, the non-significant effects

both during demolition and construction and operational development are agreed.

The HTVIA considers the impact on the following heritage receptors within LBTH: Tower of London World Heritage Site (WHS) and listed buildings within it, the Tower Conservation Area and Grade I Tower Bridge and its surrounds. The Tower of London's designation as Scheduled Monument is only mentioned, however, it appears that no assessment of that particular designation has been carried out. Similarly, it is not clear whether all listed buildings within the Tower of London as stated in paragraph 8.253 of the HTVIA have been considered in the assessment.

Views 10 and 11 would experience a significant effect during operational development leading to moderate to major beneficial. With regard to the visual impact assessment, the relevant receptors within LBTH include Views 12a, 12b and 12c, all which are located within the Tower of London. LBTH welcomes the use of winter photography for these views so that full impact from the Proposed Development can be understood.

Assessed views 12a, 12b and 12c would all experience non-significant effects, concluded as negligible to minor adverse effect during the demolition and construction phase. This would be the same for the cumulative assessment of demolition and construction for Views 12a and 12b while View 12c would experience no effect.

All of the three views would experience negligible to minor neutral effect (non-significant) as a result of the operational development. This would be the same in the cumulative assessment for Views 12a and 12b, while for View 12c there would be no effect in the cumulative assessment.

It should be noted that the assessments within the Built Heritage and Townscape and Visual Assessments are subjective. City of London Corporation should consider whether adequate justification has been provided for the conclusions of the ES in relation to townscape, visual and heritage effects.

In terms of the ES, LBTH has no objections in relation to the aspects listed, on the basis that the ES is considered

	<p>to be adequate by City of London Corporation in accordance with the EIA Regulations 2017 (as amended), and the methodology adopted is appropriate and does not under or overstate the assessment of effects. City of London Corporation must consider whether further information is required in accordance with Regulation 25 of the EIA Regulation.</p> <p>--</p> <p>On their second response, following re-consultation of the application LBTH responded with the following comment:</p> <p>LBTH previously provided comments on the scheme on 14.20.2024, given the similarities with the current scheme, our previous comments reflect LBTH position.</p> <p><b>Officer response:</b> The matters in this comment are addressed in the Tall Building, Architecture, Heritage and Strategic Views sections of this report.</p>
<p><b>Historic Royal Palaces (HRP)(Tower of London)</b></p> <p>Letter dated 19.08.2024</p>	<p>HRP identify the significance of Tower of London as a World Heritage Site, Scheduled Monument, collection of listed buildings and conservation area. Its Landmark Siting and the Physical Dominance of the White Tower are two of the key attributes of its Outstanding Universal Value (OUV), experienced through views into, within and out of the property, that are vulnerable to the impact of tall buildings in the City.</p> <p>This development is located within the City of London's proposed southern extension of the City Cluster, appearing on the west side of the Cluster when viewed from the Tower of London. It is HRP view that the continual encroachment of the City Cluster on the key views to and from the Tower have caused incremental harm to the OUV of the World Heritage Site. The extension of the Cluster to incorporate 20 Fenchurch St will exacerbate that harm.</p> <p>The proposed development at 60 Gracechurch Street will be largely occluded from key views to and from the Tower by 20 Fenchurch Street and the consented scheme for 55 Gracechurch Street (if built out) and so in the cumulative</p>

	<p>view the additional harm would be less than substantial, in accordance with HRP view.</p> <p>HRP adds that if the latter scheme is not constructed, the proposals for 60 Gracechurch Street would add significantly to the bulk of the cluster on the western edge and hence on the OUV attributes described above. They do not agree that the effect would be in any way 'beneficial' as described in the applicant's Heritage and Townscape Visual Impact Assessment (HTVIA) and the harm must be weighed against the public benefits of the proposals.</p> <p><b>Officer response:</b> The matters in this comment are addressed in the Tall Building, Architecture, Heritage and Strategic Views sections of this report.</p>
<p><b>TfL Spatial Planning</b></p> <p>Letter dated 28.08.2024 and email dated 14.11.2024</p>	<p>TfL's comments in summary are as follows:</p> <ul style="list-style-type: none"> <li>• Seeking a contribution of £200,000 for a new Cycle Hire docking station at the site or in the local vicinity.</li> <li>• More detailed Construction plans and further engagement with TfL are required due to potential impacts on pedestrians, cyclists and buses along A10 Gracechurch Street.</li> <li>• This must include a Stage 1 Road Safety Audit (RSA) and Pedestrian Comfort Levels (PCLs) analysis for the proposed construction access arrangements, provided prior to determination.</li> <li>• A Section 106 (S106) contribution of £729,869 (BCIS index linked) is sought for the A10 Transport for London Road Network (TLRN) improvement scheme including junction, crossing and footway improvements and making permanent the footway extensions delivered in temporary materials during the COVID pandemic. This also requires a backstop clause to ensure delivery of TLRN highway works around the site boundary in the event that our scheme should not proceed as planned, though it is currently expected to do so in good time for completion and opening of the development, as required by CIL and S106 regulations.</li> <li>• ATZ (Active Travel Zone) and local highway improvements, particularly at the Fenchurch Street</li> </ul>

	<p>pedestrian crossing, should be secured by the Corporation and funded by the development.</p> <ul style="list-style-type: none"> <li>• The proposed cycle parking entrance on Fenchurch Street should also be subject to a Stage 1 RSA and Designer's Response prior to determination. RSAs requested must comply with TfL Road Safety Audit Procedure May 2014 SQA 0170.</li> <li>• The trip generation and London Underground (LU) impact assessment in the TA requires further work, especially given that full strategic modelling would usually be expected given the size and scale of the proposed development.</li> <li>• PCL analysis of adjacent local crossings is also requested.</li> <li>• Currently the cycle parking proposed does not comply with London Plan Policy T5 and the London Cycle Design Standards (LCDS) in terms of design and amounts of different parking types.</li> </ul> <p>The full response is attached in the appendix of the report.</p> <p>--</p> <p>Following the above comments the applicant engaged with TfL in negotiating the requested contributions. TfL responded with amendments to their requirements as follows:</p> <p>"TfL's requested planning obligations for this site</p> <p>£100,000 prior to occupation to co-fund with the 70 Gracechurch Street development a new Cycle Hire docking station in Rood Street within walking distance of the site. To ensure the development complies with London Plan policy T5 (Cycling)</p> <p>The payment of £683,658 to TfL prior to commencement towards TfL Highway Improvements or the completion of a s278 Agreement in respect of the S278 Works with TfL prior to commencement.</p>
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	<p>In the event a s278 Agreement for the s278 Works has been entered into prior to commencement, to complete the s278 Works prior to Occupation of the Development</p> <p>The TfL Highway Improvements to include but are not limited to:</p> <ul style="list-style-type: none"> <li>- safety improvements to junctions in the vicinity of the Site;</li> <li>- measures in the vicinity of the Site to improve safety and security at night and reduce fear of crime;</li> <li>- pedestrian corridor improvements in the vicinity of the Site; and</li> <li>- any other strategic highway mitigation works reasonably necessary to make the Development acceptable</li> </ul> <p>The s278 Works to include but are not limited to:</p> <ul style="list-style-type: none"> <li>○ pit lane on A10 Bishopsgate to support construction of the development</li> <li>○ potential signal retiming at same junction</li> <li>○ supporting highway modelling if necessary</li> <li>○ Road Safety Audits (RSAs)</li> <li>○ following TfL Streetscape Guidance with approval from TfL</li> <li>○ ensuring sufficient space along the A10 for Bus operations and for Cyclists to pass Buses and other traffic safely on the near side both northwards and southwards</li> <li>○ co-ordination with 70 Gracechurch Street development's highway works</li> <li>○ improving the crossings that connect to the South East corner of the Gracechurch Street / Fenchurch Street / Lombard Street junction</li> </ul> <p>We would ask that the definition in the s106 refer to the attached plan</p>
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	<p>Reason: To ensure the development complies with London Plan policies T1 (Strategic approach to transport); T2 (Healthy Streets); T4 (Assessing and mitigating transport impacts), T5 (Cycling), D8 (Public realm) and D9 (Tall buildings)”</p> <p><b>Officer response:</b> The matters in TfL’s comments have been negotiated with the applicant and are covered in the Highways and Transportation section of this report and S.106 obligations have been recommended in the CIL/S106 section of the report.</p>
<p><b>London Borough of Southwark</b></p> <p>Letter dated 09.09.2024 and 15.11.2024</p>	<p>No comments.</p>
<p><b>St Paul's Cathedral</b></p> <p>Letter dated 23.09.2024 and Email dated 19.11.2024</p>	<p><b>Introduction</b></p> <p>Further to a review of the submission documents and a prior pre-application meeting, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the emerging proposals for 60 Gracechurch Street.</p> <p><b>Background &amp; Pre-application Discussion</b></p> <p>We thank the project team for reaching out regarding pre-application discussion for the emerging scheme and for their time and thoughtful presentation. We issued comment to the developer team in response to pre-application discussion. As the scheme is, in the main, unchanged from pre-application stage, much of our comment is repeated below.</p> <p><b>Relevant Planning Policy</b></p> <p><b>Planning Policy Context</b></p> <p>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 some consideration to the emerging emerging City Plan 2040 (previously City Plan 2036).</p>

	<p>Whilst a broad range of policies are relevant, particular consideration is given to those concerning protection of the historic environment and tall buildings.</p> <p>The key policies relevant to the impact of the emerging proposals on the Cathedral are summarised below:</p> <p>City of London Local Plan 2015:</p> <p>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</p> <p>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 of these emerging policies therefore has some relevance for this application.</p> <p>The London Plan 2021:</p> <p>Policy D1: London’s Form, character and capacity for growth</p> <p>Policy D4: Delivering Good Design</p> <p>Policy D9: Tall Buildings</p> <p>Policy HC1: Heritage Conservation and Growth</p> <p>Policy HC3: Strategic and Local Views</p> <p>Policy HC4: London View Management Framework</p> <p>National Planning Policy Framework:</p> <p>Chapter 12: Achieving well designed places</p> <p>Chapter 16: Conserving and enhancing the historic environment</p>
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	<p><b>Comment</b></p> <p>Given the location of the scheme, potential visual and heritage impacts to the Cathedral from the Processional Way are of greatest concern. As previously raised with regards to the design development of the extant consent for 70 Gracechurch Street nearby, we would be strongly opposed to any proposals that impinge on these Processional Way views and kinetic experience, that (if found) would have the potential to cause a high level of visual impact and heritage harm to this Grade I listed building of exceptional significance.</p> <p>We welcome discussion of potential impacts from the Processional Way within the submission material and our pre-application meeting. The concept of the ‘cloak of invisibility’ developed by MillerHare, and the adherence of the emerging scheme to this development envelope, is welcome. As discussed, we still seek assurances that the proposals will absolutely not be visible in these views. To be clearest, we would object to any ‘technical visibility’ so often discussed in relation to proposals of this nature.</p> <p>We therefore welcome sight of MillerHare’s methodology for this ‘invisibility’ envelope, including both technical and non-technical summaries to be reassured that our understanding of the proposal is correct and there will be absolutely no visibility from the Processional Way. We request that Officers interrogate this material accordingly and welcome its inclusion in the proposals.</p> <p>As the applicant made clear in the materials shared, the proposal for this major tower will also be appreciable in views from the south west where the Cathedral is visible. These include LVMF view 15B.2, where the cluster appears to the viewer to the right-hand side of the Cathedral.</p> <p>LVMF guidance for this view states that ‘New tall buildings should seek to complement the City’s eastern cluster of tall buildings with buildings of a height appropriate to their site and of high architectural design quality’ and ultimately that development proposals maintain the visual prominence of the Cathedral and not diminish the ability to appreciate the building as a Strategically Important Landmark.</p>
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From recent experiences (and discussion in our pre-application meeting) we acknowledge the rate of development within the cluster – especially those constructed and consented schemes between 20 Fenchurch Street (the Walkie Talkie) and the centre of the cluster. Many of these are located along Gracechurch Street, now including No. 60.

It was helpful to understand from the submission materials and the preapplication presentation how proposals fit within this emerging context. However, following consideration, we have some concerns regarding the height and massing of the proposals in relation to the overall urban form of the cluster. While these are predominantly view management and urban design considerations (with relevance to important views of the Cathedral, within which St Paul's is appreciable as a Strategically Important Landmark), this does not preclude the potential for heritage harm – which officers should interrogate and judge accordingly.

As described, the height of the emerging proposals for No. 60 attempts to mediate between the consented 70 Gracechurch Street and extant 20 Fenchurch Street.

Our concern remains that there appears to be a lost opportunity to manage the urban form of the cluster appropriately. We suggest that the Walkietalkie (which is in the background) should not appear to be a 'target' for the scale of these new buildings. We would encourage design exploration of proposals mediating between the consented 70 Gracechurch Street and the nearby, lower, 55 Gracechurch. We also suggest that design dialogue should take into account the now live planning application for 70 Gracechurch Street.

While 20 Fenchurch Street does indeed stand out markedly at this edge of the cluster, we would be concerned of proposals responding to its height and creating a very tall 'wall' of buildings along Gracechurch Street. This would effectively reinforce a hard datum to urban form, almost a plateau rather than a gentler descending gradient to the cluster's edge (see below extract and LVMF view 15B.1, cumulative and proposed).

We suggest that the relationships between these proposals are not satisfactorily coordinated within the

general design aspirations and Policy intent of the Cluster. Whilst some may feel that the built form of cluster has the appearance of a ‘massing and architecture competition’, with each new major development seeking to out-compete a neighbour, we have always understood that the planning authority has an eye for overall form, urban design, and overall quality – especially as this impacts public amenity in key views. Policy CS14 of the adopted 2015 Local Plan states proposals must have due 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 is mirrored more broadly within Policy CS10 Design. Indeed, whilst not yet adopted, the emerging City Plan 2040 also mentions at Policy S12 Tall Buildings that new development should ‘not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and townscape character, creating a coherent cluster form.’

What appears to be emerging with the recent sequence of developments for Gracechurch street does not appear to be measured and ordered with an eye to urban design of the skyline and topography in relation to the river Thames. This sequence seems to be a bulky wall ‘infilling’ to the scale and mass of the Walkie Talkie; ending in a cliff-edge. Is there not a more considered approach needed; some deliberation and judgement?

*Broadly, our thesis is that the urban form of the cluster should be tailing off to the river as indicated by the overlaid line, with the Walkie-Talkie as the background, not making a camel’s ‘hump’ and a cliff-edge.*

It is stated that the proposals would be compliant with emerging Policy in the 2040 Local Plan – though we here note we have our own queries and concerns as to the nature of this Policy that are yet to be resolved. In the interim, we would hope that development aligns with the spirit of established Policy that has informed the development of the cluster to date – namely that new development maintains and contributes to an appropriate gradient of urban form with design deliberation and care. We feel this is the language of the LVMF noted above the new development ‘*should seek to complement the City’s*

*eastern cluster of tall buildings with buildings of a height appropriate to their site’.*

We are not persuaded that this aim is achieved in letter or spirit of this proposal, and that the proposals would not have minor adverse visual and townscape affects.

#### Conclusion

we again thank the project team for their time and network with regards to their pre application engagement, and the inclusion of additional and specific information within the planning submission to respond to some of our comments.

We also warmly welcome the ethos of the project team with regards to their clear investment in the site and its long term prospects. Given these considerations, our comments are intending to assist the project team’s aspirations an investment for the site in the long term.

However, we do have concern regarding the way the proposals would respond to the current and emerging context in terms of urban design, and as appreciable in strategic and local views.

We hope that our comments are constructive and assist the project team, and Officers at the City, moving forward.

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On 19.11.2024 the Lead Heritage Consultant and Clerk to the Surveyor emailed the LPA on the following:

Following review of the updated proposals, we would note that our previous comments still stand – though we welcome attempts to positively respond to the cluster context.

In addition, we would register concerns regarding any increase in visual impact at night as a result of changes to the detail of the façade and the proposed lighting strategy. We therefore consider that ‘architectural’ external lighting, as appears to be indicated within the scheme, would not be required.

	<b>Officer response:</b> The matters in this comment are addressed in the Tall Building, Architecture, Heritage and Strategic Views sections of this report.
<b>Royal Borough of Greenwich</b>  Letter dated 09.10.2024	No comments.

### Letters of Representation

34. One public representation (neutral) was received during the first round of consultation. The representation was made by CMS Cameron McKenna Nabarro Olswang LLP on behalf of owners of 10 Fenchurch Street (Noble Time Limited), which is adjacent to the east of the site.
35. The letter informs that the owners of 10 Fenchurch Street do “not object to the principle of the redevelopment of the Property but is concerned to ensure that any development of the Property approved pursuant to the Planning Application does not impact the use, occupation and value of 10 Fenchurch Street either during construction or following completion and occupation of the new building.” The concerns raised focus on impacts to the amenity (noise and vibration) of the occupiers at 10 Fenchurch Street during the construction period. Other matters of concerns raised in the submitted comment include crane and scaffolding over-sailing; rights of light; party wall agreements; servicing arrangements during construction and operation; and other public realm considerations.
36. In response to the above comments, the applicant submitted statement (overview of ongoing engagement, prepared by Jbp) on 22<sup>nd</sup> November 2024 in which it is stated that the applicant has been engaged on ongoing discussions with the owners of 8-10 Fenchurch Street ad they have met with them on that basis. The statement mentions the following “*The purpose of this has been to ensure they are well informed about the proposals and the progress through the planning process. Stakeholders welcomed this ongoing engagement, which will continue to determination and beyond*”.
37. Some considerations raised above are not material planning considerations and fall under separate legislative frameworks. For the planning considerations, officers confirm that impacts of construction would be managed through Construction Management Plans and Schemes of Protective Works which would be secured by condition.

38. Another two public representations (objections) were received during the second round of consultation from residents of the Jamaica Buildings, St Mickael's Alley. The first comment objects to the further large-scale development in a densely developed area which would cause additional congestion, night time noise and pollution during the construction period and the second requests a condition to be considered to restrict construction during night hours if the proposed development is carried. Officers note these comments and respond to them in the report and by way of recommended conditions that control the hours of construction, the construction logistics and the protection of the amenity of nearby occupants. More information related to pollution can be found in the Air Quality section in this report.

### **Policy Context**

39. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
40. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which has undergone Regulation 19 consultation. The City Plan 2040 has been submitted to the Secretary of State and it is anticipated to be examined in public in Spring 2025. 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.
41. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.
42. The 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.
43. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
44. 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:
    - 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
    - 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.
45. 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).”
46. 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.
47. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
48. 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.
49. Paragraph 97 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.

50. Paragraph 103 of the NPPF states that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
51. 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”.
52. 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.
53. 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”.
54. 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.”
55. 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.

56. 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...’
57. 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.
58. 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.
59. 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.
60. 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.
61. 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.”
62. 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”.
63. 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:
- grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
  - assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
64. 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”.
65. 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”.
66. 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 and Considerations**

67. 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).
68. 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).
69. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses.
70. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.
71. The principal issues in considering this application are:
- a) The economic benefits of the proposal.
  - b) The appropriateness of the proposed uses, including the site's cultural offer.
  - c) The appropriateness of the site to accommodate a tall building.
  - d) The appropriateness of the architecture and urban design of the proposals.
  - e) The impact of the proposal on existing public realm and the acceptability of the proposed new public realm.
  - f) The impact of the proposal on the Tower of London World Heritage Site.

- g) The impact on strategic views in the London Views Management Framework and on other strategic local views.
- h) The impacts of the proposal on the setting and significance of heritage assets.
- i) The potential impacts of the development on buried archaeology.
- j) Whether the scheme is accessible and inclusive.
- k) Transport, servicing, cycle parking provision and impact on highways.
- l) The environmental impacts of the proposal including wind microclimate, daylight, sunlight, overshadowing, solar glare and light trespass, air quality, noise and vibration, contamination, building resource efficiency, energy consumption and sustainability.
- m) The impact of the development on flood risk.
- n) Security and suicide prevention.
- o) The outcome of the Health Impact Assessment.
- p) Ensuring that fire safety has been designed into the proposal.
- q) An assessment of the public benefits of the proposal and whether they would be sufficient to outweigh any heritage harm.
- r) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010).
- s) The requirement for financial contributions and other planning obligations.

### **Economic Considerations**

72. The National Planning Policy Framework places significant weight on the need to support economic growth and productivity taking into account both local business needs and wider opportunities for development. Significant weight is to be given to the economic objective (to help build a strong, responsive and competitive economy, as referred to at paragraph 8 of the NPPF). In deciding this application the weight to be given to the economic benefits will depend on the nature and extent of those benefits in the light of any other planning considerations relevant to the assessment.

73. 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.
74. 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.
75. 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 Sized Enterprises (SMEs). The newly launched Small and Medium Enterprise Strategy (2024) includes the City's strategy to attract and support the growth of 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.
76. 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.
77. 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, 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. London Plan Policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.

78. 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.
79. 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.
80. 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.
81. In terms of the Local Plan 2015 Strategic Objective 1 seeks 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.

82. 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 project 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.
83. The emerging 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.
84. The application site is located in an area that is not inappropriate for tall buildings to the south of the Eastern Cluster as identified in the Local Plan 2015 and within the City Cluster Tall Buildings area identified in the emerging City Plan 2040. The Cluster Policy area is defined by an illustrative diagram and on the Policies Map in the adopted and emerging Plan. The area on appropriate sites. Strategic Policy S21 of the emerging City Plan identifies the City Cluster as a key area of change where a significant growth in office floorspace and employment will be successfully accommodated including through the construction of new tall buildings together with complementary land uses, transport, public realm and security enhancements.
85. Despite the uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and emerging 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 also reflected in the Corporations 'Destination City' vision for the square mile.

86. The proposed scheme would deliver on the City's objectives and support the City's economic role by providing 154,156sq.m (GIA) of flexible office floorspace alongside a complementary retail and cultural offer and enhanced public realm.

### **Land Use**

87. The proposed development would be mixed use. This section of the report provides an assessment of the acceptability in principle of the proposed land uses. As mentioned in the proposals section above, the existing and proposed land uses and their area schedule is set out below:

Table 2. Schedule of Areas

<b>Schedule of Areas</b>			
<b>Use</b>	<b>sqm (GIA)</b>		
	<b>Existing</b>	<b>Proposed</b>	<b>Difference</b>
Office (Class E(g))	13,134	52,012	+ 38,878
Retail / Café (Class E (a) / (b))	1,076	187	- 889
Public space (Sui Generis) (Incl. Level 35 (the Sanctuary & Garden and associated ground floor Passage)	0	611	+ 611
Leaning Space at Level 35 (Sui Generis)	0	83	+ 83
Ancillary basement and BOH	1,948	7,745	+ 5,797
<b>Total</b>	<b>16,158</b>	<b>60,638</b>	<b>+ 44,480</b>

### **Provision of Office Accommodation**

88. 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.

89. The predominant use of the proposed development is as office space, comprising of 52,012 sqm (GIA) of Commercial/Office Floorspace Class E (an uplift of 38,878 sqm (GIA) of office floorspace on this site). The office space is classified as Grade A office space.
90. Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City. The emerging City Plan 2040 identifies a need for a minimum 1.2 million square metres NIA of office space, which approximately equates to 1.6 million square metres GIA.
91. The Offices Topic Paper as part of the evidence base for the emerging City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The proposed development site is within the 'City Cluster' category, which is modelled at being able to achieve an office floorspace uplift of 630,000 - 770,000 sqm. The proposed development would deliver a significant amount of this floorspace target providing 38,878 sqm (GIA) uplift which accounts for 2.4% of the total office floorspace (1.6 million sqm GIA) to be delivered by 2040 as required by the emerging City Plan 2040. The site is central to the City's growth modelling.
92. 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 and exterior environment amenity, floor area, and choice of outlook. This would accord with the 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.
93. 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 a substantial uplift 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/Café use**

94. The north of the site, elevation along Fenchurch Street, is located within the Leadenhall Market Principal Shopping Centre (PSC) as defined by the adopted Local Plan 2015 and the emerging City Plan 2040. Policy DM 20.1 of the Local Plan 2015 resists loss of retail, prioritises the PSCs for shops and seeks to provide new retail floorspace. The policy sets out the key criteria for loss of retail including the maintenance of shopping frontage predominance within PSCs, the contribution the unit makes to the function of the PSC, and the effect of the proposal to the area involved. Strategic Policy S5 and Policy RE1 of the emerging City Plan 2040 are relevant to retailing and PSCs. Emerging Policy RE1 resist loss of ground floor retail frontage and/or floorspace and proposals for changes between retail uses would be assessed against the contribution a unit makes to the function and character of the PSC, maintaining an active frontage, and the effect of the proposal on the area (size of the unit, length of the frontage, composition, distribution and location of retail uses and units within the frontage). It is highlighted that the legal context to Policy DM 20.1 has changed, following changes to the Use Class Order 1987 (as amended) on 1<sup>st</sup> September 2020 where the former use classes of shops, financial and professional services, restaurants and cafes, non-residential institutions, and assembly and leisure uses merged into one use class (Class E), which allows changes between Class E uses at any time without the need for planning permission (i.e. changes from a shop to a café or offices), unless there is an existing planning restriction for a particular site. The assessment of the proposals has therefore taken these changes into consideration, given that it constitutes a fallback position.
95. Policy DM 1.5 of the Local Plan 2015 and Policy OF1 of the emerging City Plan 2040 encourage a mix of commercial uses within office developments which contribute to the City's economy and character and where such uses would not compromise the operation of office premises, would activate streets and provide supporting services for businesses, workers and residents.
96. The existing site contains 1,076 sqm (GIA) of retail floorspace, currently occupied by a pharmacy and beauty retail unit (Boots). The retail unit is accessed from the northwest corner of the building offering entrance to a staircase and an accessible platform lift leading to the lower ground floor where the store is located. A secondary entrance is located at the northeastern side, at Fenchurch Street, of the building giving way to part ground level store area with a staircase leading to the lower ground floor store. The street elevation consists of shopfront glazing and a louvre section at fascia level running along the full extent of the shopfront. Only the northern part of Gracechurch Street elevation provides a glazed shopfront offering street views into the lower ground floor retail unit. Due to the level changes and the internal layout of the existing

shop, the quality of the shopfront is poor and does not provide a particularly active or attractive frontage.

97. The proposed scheme would provide 187 sqm of retail space at the ground floor and thereby the site will see a reduction of retail area equal to 889 sqm (GIA). The new ground floor would provide a two storey gallery space, with active frontages and animated spaces along the west and part north street elevations. The east side of the proposed Fenchurch Street ground floor elevation would see a reduction of shopfront frontage due to a new UKPN substation access and the provision of dedicated bike access into a lift lobby. Planting areas would be integrated within the depth of the ground level façade to limit the impact on pedestrian comfort. The northwest corner of the building would offer the main entrance to the offices foyer and the café area located towards the south of the building's ground level. Gracechurch Street would see an increase in active frontage compared to the existing situation, and a new public realm area would be created to the south (the Undercroft). The design of the new public realm would provide space for people to dwell in the daytime offering the main point of arrival to visitors of the newly formed elevated public spaces of the building. There would be direct access from this area to a secondary entrance to the south of the ground floor café achieved via a set of steps or a platform lift due to the level changes. Its design would give a further dynamic enhancement and activation to this area considering the extensive green provision integrated into its design alluding to the public roof garden.
98. The proposals would result in a total loss of retail floorspace within the PSC and re-provide a small portion of retail as a café outside the PSC. It should be noted, that offices and retail fall within the same use class (Use Class E) and the loss of retail floorspace to offices in this occasion is not subject to planning permission, as explained further above, and thereby would not form part of this assessment.
99. The site's north frontage belongs to the peripheral location in the PSC, with Leadenhall Market being the centre of the PSC, with a main entrance point about 120m to the north of the site along Gracechurch Street. There is a focus in the emerging City Plan 2040 to transform Leadenhall Market to become a primary destination for visitors, capitalising on its unique heritage and nearby emerging attractions such as public elevated spaces. The expansion of the City Cluster workforce will increase the demand of retail activity in the surrounding streets. The emerging City Plan 2040, seeks opportunities to improve wayfinding in the area and better revealing the presence of Leadenhall Market itself, and to improve the accessibility of the area.
100. The proposed building would create a new visitor attraction of public elevated spaces in the surroundings of Leadenhall Market with a large open public space

at ground level on Gracechurch Street, therefore contributing to the vision of this area. Whilst the ground floor would result in a reduction of traditional retail floorspace in a PSC location onto Fenchurch Street, it would provide an open plan café area with direct connection to the main arrival point, a new public realm area, of the elevated public spaces. It is recommended that the site would also create an opportunity to improve the presence and heritage importance of Leadenhall Market in line with the aspiration of the emerging City Plan by making references to it in the visitor's cultural journey to the roof terrace, and through wayfinding and signage strategies to be detailed and agreed upon under the Cultural Implementation Strategy secured via S.106.

101. In terms of activation, the amount of active retail frontage at the extent of the site's two street frontages is largely retained and upgraded, with the loss of some activation along Fenchurch Street and the introduction of additional active frontage and animated spaces along Gracechurch Street. Whilst the loss of frontage along Fenchurch Street is resisted within the policy context, the visitors journey begins at Gracechurch Street and the presence of a café area at this location would respond better to and complement the uses of the upper levels as well as increase the permeability into the building through the connection to a passage leading to the elevated public areas. It is considered that the activation along Gracechurch Street frontage would create better directional opportunities to the main entrance of Leadenhall Market, located at the same street frontage towards the north, and it is welcomed.
102. Compared to the existing unit, the proposed ground floor, addresses the existing level constraints at the site, offering level access to the café from the same entry point at the northwest corner of the building and step-free secondary access from the new public realm. There is only one retail unit currently on site, and the re-provision retains that number.
103. In weighing the planning balance, it is necessary to take into account the fact that the current Local Plan and the emerging City Plan places emphasis on the primary business function of the City and on strengthening the cluster of activities that contribute to London's role as the world's leading international financial and professional services centre. The scheme would provide significant additional office floorspace, within the emerging City Cluster contributing to meeting the City's targets for increasing office floorspace. Other objectives of the emerging City Plan 2040 met include provision of cultural and public facilities including a new publicly accessible roof garden and educational space providing higher level views.
104. It is considered that the proposals are acceptable. The mix of uses would provide a complementary use to the offices and publicly accessible areas on the upper floors in accordance with Policy DM 1.5 as well as provision for other

workers, visitors and residents of the City in accordance with the emerging City Plan 2040 Policy OF1. Whilst the proposed development would result in loss of some activation on a PSC frontage, contrary to adopted Local Plan Policy CS20, DM20.1 and emerging City Plan Policy RE1, it is considered to be acceptable for the reasons outlined above. A condition is recommended to secure retail uses falling within Class E (a/b), to prevent the change to any other use within Class E.

### **Cultural Offer and Strategy**

105. Policy CS11 of the Local Plan seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy by:
- Providing, supporting and further developing a wide range of cultural facilities.
  - Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.
  - Protecting existing cultural facilities where they are need.
  - Providing visitor information and raising awareness of the City's cultural and heritage assets.
  - Allowing hotel development where it supports the primary business or cultural role of the City.
106. The emerging City Plan 2040 under Policy CV2 will seek opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City.
107. London Plan Policy D9 part D seeks to incorporate free to enter publicly accessible areas in tall buildings. Policy DM10.3 of the Local Plan encourages high quality roof gardens and terraces where it does not cause other impacts with public access secured where it is feasible. Strategic Policy S8 of the emerging City Plan 2040 seeks to deliver publicly accessible spaces in tall buildings and emerging Policy DE4 requires all tall buildings or major developments to provide free to enter, publicly accessible elevated spaces, which may include roof gardens, terraces, public viewing galleries, or other retail or leisure facilities to create attractions in the City and views from the skyline. Strategic Policy S21 (City Cluster) of the emerging Plan requires the

provision of open spaces at ground level free to enter publicly accessible spaces such as roof gardens and roof terraces, and cultural and leisure destinations and other facilities, that will provide additional public space and experiences for people working in the City alongside visitors and residents.

108. 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.
109. A cultural plan has been submitted for the proposed site in accordance with Policy CV2 of the emerging City Plan 2040. The plan analyses the City's existing cultural infrastructure and sets out the applicant's vision to provide an environment in the City that supports wellbeing for all users as a place of rest and nourish and a place of learning opportunities.
110. A new elevated public space is proposed at level 35. This space offers interior space (the Sanctuary), and exterior space (the Garden) with panoramic views to the west and south towards the Thames. The Sanctuary would offer a range of seating options and available public food and drinks kiosk for visitors to grab a drink as they enjoy the views in a sheltered area, even when the weather conditions are not favourable for outdoor activities. The Garden offers an external green space with species specially selected to ensure yearlong survival over the seasons. Landscaping would incorporate seating and gathering spaces and would be placed strategically to create accessible routes. Details of the landscaping strategy and accessibility of these areas would be secured under planning conditions. This space is intended to create a calming environment for reflection and contemplation in lush seasonal planting and local biodiversity and form an escape from the busy city centre.
111. Level 35 also provides a Learning Space to accommodate free school visits and community groups to book and use. The Learning Space would offer 83 sqm of flexible layout to ensure it can host a variety of classes and workshops, catering to different class groups and ages. From the education space it is intended students would gain an insight into the City's history and apply learning while observing panoramic views of the capital with easy access to nearby heritage and cultural sites. Its direct access and view to the Garden will allow an interactive nature-based learning. To support the activities and dwell times



of this space, support facilities would be offered for the users such as secure bag storage, dedicated WCs and audiovisual systems.

112. The visitor's journey to level 35 has been designed to start upon arrival to a newly formed public realm space, the Undercroft, located at the south of the ground level with direct level access to Gracechurch Street. A wayfinding strategy and signage design would be secured under planning conditions to ensure the visibility and legibility of this arrival point. The Undercroft, as described in the proposals section further above in the report, is an area dedicated for public use that combines extensive greening and seating opportunities in a sheltered, secure space accessible during the day. The biophilic design and the mix of soft and hard landscaping features in this space would allude to the roof garden at level 35 and with the support of acoustic designs it would promote a calming experience for the visitors. The southern part of the public realm area would demarcate one accessible car parking and visitor cycle parking promoting inclusive and active transport. Servicing will take place in the Undercroft out of hours, ensuring minimal overlap between member of the public and any vehicles, as secured by condition. Further details on the operation and management of the public realm would be secured under the S.106 agreement.
113. The direct access from the public realm to the ground floor internal café provides an opportunity for respite from the busy street upon arrival or following a visit to the public spaces. Otherwise, visitors can go directly to the check in point and security screening at the east end of the Undercroft. A passage has been designed to form the way towards the visitors lift. The passage would form a fully enclosed area with references to the site's heritage connecting it to St' Benet's Church, which was located on the site until the 1800s, and other buildings visible from the panoramic views of the rooftop. This space would be carefully designed with creative lighting, sound and materiality that stimulate the interest of the user. At the end of the passage is a lift to take groups of up to 40 people to the Sanctuary. It is noted that the building provides two lifts in case of malfunction or demand. Visitors would follow the same journey at the end of their visit.
114. The public spaces at level 35 (Sanctuary, Garden, Learning Space) have a capacity of 165 people at any one time, and this number would be managed to ensure evacuation and safety of all those visiting.
115. The Sanctuary and Garden spaces would operate between 10am and 9pm or nautical dusk, meaning 1 hour after sunset (whichever is later) seven days a week. It has an area capacity of 125 people and will be free to access at all times by members of the public with tickets bookable every 15 minutes and 20% walk-ups. Consideration has been given to dwell times throughout the

journey, however these will vary depending the user group types, hours of the day and seasons. It is estimated that individual visitors of the Sanctuary would spend approximately 25-130 minutes throughout their whole journey, whilst school groups would dwell for approximately 60-185 minutes. Details of the management and operation of the public spaces would be secured under S.106.

116. In terms of the Learning Space, the hours of operation would be the same as the Sanctuary offering four bookable slots (10am - 1pm, 1pm - 4pm, 4pm - 7pm, 7pm – 9pm). The area would have capacity for up to 40 people (including school children and adults) and would be free to book by all schools online or over the phone. A S.106 obligation would secure the prioritisation of state schools of more deprived areas in the booking system. Details of the management and operation of this space would be secured under S.106.
117. The applicant has not selected an operator for the public spaces at this stage, however, it is noted that one operator would be responsible to manage the Sanctuary/Garden and Learning Space and all of its associated spaces, including security, facilities, cleaning, reception and check-in of the public. The cultural plan states that the applicant would look to progress entering an agreement with an operator during construction and prior to occupation of the proposed development. This, including details of further engagement and partnerships, will be secured in the Cultural Implementation Strategy under a S.106 obligation. The funding of these spaces would be covered by the building owner and/or the operator with further details secured in the Cultural Implementation Strategy.
118. On 22<sup>nd</sup> November 2024, the applicant submitted an overview of their ongoing engagement (statement prepared by Jbp) with educational providers, communities and organisations to understand how the Learning Space and the roof garden could support educational and community needs across London. This statement informs officers of the ongoing positive discussions with stakeholders to ensure good use and wide acknowledgement of the cultural provision on this site on its way to implementation and operation.
119. The provision of the roof garden and education space would accord with Local Plan Policy DM10.3 and emerging City Plan 2040 Policies S8, S21 and DE4 which seek to secure the delivery of high quality, publicly accessible elevated viewing spaces. Public access to tall buildings within the City is important in creating an inclusive City. The proposal would contribute towards the network of free viewing galleries across the City. Final details of the operation of the cultural spaces would be secured through the S.106 as part of the Cultural Implementation Strategy and Management Plans.

## **Design and Heritage**

120. The relevant Local Plan 2015 policies for consideration in this section are S10, DM10.1, , DM10.3, DM10.4, DM10.8, CS12, DM12.1, CS12 CS13, CS14, CS16, DM16.2, CS19, DM19.1, DM19.2, emerging City Plan 2040 Policies HL1, S8, DE1, DE2, DE3, DE4, DE8, DE9 S10, AT1, S11, HE1, HE3, S12, S13, S14, OS1, OS2, OS3, OS5 , and London Plan Policies D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4,GG1-3, GG5, GG6.

## **Principle of a Tall Building**

121. The proposal is considered a tall building as defined by the adopted Local Plan (CS14, para 3.14.1) and the emerging City Plan 2040 (S12(1), >75m AOD) and London Plan Policy D9 (A).
122. The application 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 economic activity, in line with London Plan Policy SD4. 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.
123. 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 2015 seeks to consolidate tall buildings into a singular, coherent Eastern Cluster (CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040 (as the 'City Cluster'; policies S12 (2) and S21).
124. The application site is located outside but immediately adjacent to the southern boundary of the 'Eastern Cluster' policy area in the adopted Local Plan (CS7, fig G). In the emerging City Plan 2040, the proposal is within the City Cluster Tall Buildings Area (fig. 14) and the City Cluster Key Area of Change (fig. 27), which extend the Cluster to the south, incorporating 20 Fenchurch Street and drawing it into a singular City Cluster.
125. The application site is not in one of the areas identified as inappropriate for a tall building which are shown on Figure N of the 2015 Plan. As such, the proposal would trigger policy CS14 (3) of the Local Plan, which stipulates that 'elsewhere in the City' (i.e. other than the Cluster), other sites for tall buildings could be suitable depending on the proposal's impact on skyline, amenity, heritage assets and skyline features. Officers have assessed these impacts in the relevant sections below and conclude that, while there would be

comparatively modest impacts on the settings of heritage assets, these have been minimised through design and clearly and convincingly justified.

126. The proposal would be in the City Cluster Tall Buildings Area in the emerging City Plan 2040 and would largely comply with the relevant contour lines of the proposed City Cluster. In the language of emerging policy S12, the proposal would mediate successfully between the adjacent 140m and 160m lines, but there would be a localised breach only at the north-east corner of the proposal where it would rise to 162m. At 2m above the higher contour line of 160m, officers consider this to be a very minor breach of the contour lines and there would therefore be a degree of conflict with emerging City Plan 2040 Policy S12 (3).
127. The proposal would be in the City Cluster Key Area of Change and would draw in-principle support from emerging policy S21. While the proposal would accord with all relevant provisions of this policy, there would be a degree of conflict with S21 (5) because the proposal has been found not to preserve the settings of the three heritage assets outlined below. However, in relation to both these emerging policy conflicts, the emerging City Plan 2040 has not yet gone through Examination in Public and is therefore a material consideration to which is afforded limited weight.
128. An assessment against London Plan policy D9 (C) and (D), and the aforementioned Local Plan policy CS 14 (3) is made below, with reference to other sections of this report for more detail. It is found that the proposal would satisfy those criteria. Although, as discussed below, the proposal would cause less than substantial harm to the significance of designated heritage assets, there is clear and convincing justification for the proposals, alternatives have been explored, and there are clear public benefits which outweigh the harm. Because the proposal would accord with CS14 (3), it is considered that the proposal would effectively be in an area identified as suitable for a tall building, and comply with D9 B (3).
129. Taking all these matters into consideration, it is considered that the proposals would conform to the City's plan-led approach as the site is in an area effectively identified by the 2015 Local Plan as appropriate for a tall building and within the emerging City Plan 2040 Policy S12 in accordance with London Plan D9 (B; 3), and notwithstanding the degree of conflict identified with emerging City Plan 2040 policy S12 with regards to height and S21 with regards to designated heritage assets.

### **Tall Building – Impacts**

130. This section assesses the proposals against the requirements of policy D9 C (1-3) and D of the London Plan. The visual, functional, and environmental impacts are addressed in turn. Further assessment of the architectural approach and design details follow on below.
131. The proposal would be read as part of the consolidating City Cluster, defining the south-western edge. The height and form of the proposal has been amended following extensive pre-app discussions to ensure a sensitive relationship with the Cluster, wider London skyline, historic skyline features, local views and the significance of strategic heritage assets.
132. The proposal has been designed with the future evolution and consolidation of the Cluster in mind. In strategic London-wide and riparian views, the proposal would help to mitigate the somewhat assertive presence of 20 Fenchurch Street as an outlier from the Cluster. The proposed tower with its soaring, dynamic elevations and fanning crown treatment would help to counterbalance the singular presence of 20 Fenchurch Street, subduing its currently outlying presence on the skyline.
133. The siting and height of the proposal, to the west of 20 Fenchurch Street, and the manner in which the crown treatment steps down away from it, would, in most views, particularly those riparian views, allow 20 Fenchurch Street still to read as a subsidiary 'peak' in height at this point in the Cluster. And it would be an architectural diversification of this edge of the Cluster, with the proposal's dynamic and different elevational treatments providing a characterful foil to the simpler stylings of 20 Fenchurch Street.
134. The height of the proposal would mean that it would have an impact on the westerly views available from the Sky Garden at 20 Fenchurch Street. However, the proposed elevated public space in the scheme would entirely mitigate the impact on these westerly views.
135. The proposal would relate appropriately to the emerging and consolidating Cluster, with its height of a scale commensurate with the stepping down from the apex of the Cluster at 22 Bishopsgate and specifically chosen to create gentle undulation among the rooftop heights of the existing and consented neighbouring towers along Gracechurch Street that step down towards the river before a final, subsidiary peak at 20 Fenchurch Street. This approach has been critiqued by St Paul's Cathedral in their response to the application, but officers consider it to strike the right balance in transitioning scale down from the apex towards the river. Such an approach to the future form of the Cluster has been informed by significant 3D modelling activity to ensure that the Cluster can develop and consolidate while minimising the possibility of harm to the City's strategic heritage assets.

136. The proposal is, comparatively, of a more modest height than some of the other existing and consented Cluster towers, listed here in descending AOD order:

- Undershaft: 304.9m (2016 consent)
- 22 Bishopsgate: 294.94m
- 55 Bishopsgate 284.68m (resolution to approve)
- 100 Leadenhall 263m
- 122 Leadenhall Street (the 'Cheesegrater'): 239.40m
- Heron Tower: 217.80m
- 52-54 Lime Street: 206.50m
- Tower 42: 199.60m
- 30 St Mary Axe (the 'Gherkin'): 195m
- Leadenhall Court: 182.7m
- 20 Fenchurch Street: 177m
- 50 Fenchurch Street: 165m
- 60 Gracechurch Street: 162m (the proposal)
- 85 Gracechurch Street: 155.70m
- 70 Gracechurch Street: 155m

Visual impacts:

*a) the views of buildings from different distances:*

137. Of the long range views D9 C (1; a; i), these have been tested in the HTVIA July 2024 views Nos. 21, 22, 23, 24, 25, 26, 27, 40, D, E and addendum October 2024, and their respective Appendices. Following representations made to the EIA scoping and initial consultation by Tower Hamlets, an additional long range view was added to the addendum pack. Some of the comments received from statutory consultees, including Historic England and Tower Hamlets, relate to these views, the impacts of which are discussed throughout the report and in detail in the Strategic View and Heritage sections of the report. In all relevant LVMF views, the proposal would preserve the setting of St Paul's Cathedral as the Important Landmark as well as the composition, features and characteristics of the LVMF views. In relation to long range views, the development would comply with Policy D9 C (1 a; i).

138. In relation to mid-range views, and consideration of London Plan D9 C (1; a; ii), the impacts are largely demonstrated in Views no. 9,10,11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 29, 30, 32, 33, 36, 37, 38, 39, and appendix views A, B, C, F, G, H and I. Some of the comments from statutory consultees, including the GLA and the LB Tower Hamlets, relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report.

139. In both baseline and cumulative scenarios, in mid-range views from all directions, the proposed development would compatibly integrate into the Cluster and would be intrinsic to reinforcing and defining its overall silhouette and form. From the southwest, including from Tate Modern and London Bridge, the development would appear as a striking new part of the western periphery of the Cluster, slightly lower than 20 Fenchurch Street.
140. From the north and west, the observer would begin to experience the elegant and dynamic form of the proposals with its striking scalloped detailing, a cascade of green terraces, articulated façade design, and modelled fanning crown of roof gardens. From the southwest, south and east, the south elevation would be highly prominent, and in views from the east glimpses of the eastern elevation would also be experienced revealing the buildings crown of glass rooftop pavilions and roof gardens, as well as the large areas of innovative ‘fin’ façade system, for which the detail and final materiality is proposed to be agreed via condition and S.106 agreement. However, the architectural framework within which the facade panels are proposed would provide visual interest through their ability to reflect light and cast shadow in a dynamic way that responds to environmental conditions and the viewing position of the observer. Therefore, in relation to mid-range views, the proposed development is considered to comply with London Plan D9 C (1; a; ii).
141. In relation to immediate views, (London Plan D9 C (1; a; iii)), views no. 1, 2, 3, 4, 5, 6, 7, 8, 14, 28,31, 34 and 35 illustrate the closer range views of the building and how the building is experienced at street level from Gracechurch Street (north and south), Fenchurch Street, Eastcheap, Fish Street Hill, Pudding Lane, Lombard Street, Bank Junction, among others.
142. Within this immediate environment, the proposed building would be seen in the context of other modern and contemporary tall buildings with a landmark status, including 20 Fenchurch Street. While these immediate views would change, as the proposed building would be larger and wider than the existing, on its street fronting elevations, it would however have a positive relationship with the street, creating a comfortable pedestrian scale with a tactile quality, in addition to adding vitality to the street through clear glazed active facades, and the addition of the Undercroft public realm, which would also be an inclusive and highly planted space. In relation to immediate views the proposals would comply with D9 C (1; a; iii).
143. In relation to D9 C (1; b) the proposal has been designed to assist the future evolution and consolidation of the City Cluster. It would define the Clusters western edge and reinforce the Cluster’s skyline form, which would accentuate the important place of the City Cluster in the mental ‘mind map’ of the City and London, assisting wayfinding and London-wide legibility. The skyline impact is

commensurate with a recognition of the importance of the City and the Cluster in the wider historical and socio-economic topographical reading of the capital. As such, it is considered the proposal would reinforce the existing and emerging Cluster of tall buildings, reinforcing the local and wider spatial hierarchy, aiding legibility and wayfinding. Therefore, the development is considered to comply with D9 C (1; b).

144. In relation to D9 C (1; c), the architectural quality of the facades is exemplary and would be maintained throughout its life span. The tower would be visually split into two parts: the ground floor podium, and tower above with spine of terraces and positively finished by a crown of fanning glass pavilions and roof gardens, offering visual relief and unique public and occupier amenities. However, final details of materiality are proposed to be secured through the S.106 agreement, with greater detail provided for the south and eastern elevations, to ensure the design intent of the elevations – to provide rippling movements of light and shadow - will be executed to the highest quality.
145. Overall, the architecture is well-considered in the round, and of a high quality, which would be visually distinctive and an attractive addition to the skyline in of itself, and is considered to comply with D9 C (1; c)
146. In relation to D9 C (1; d), a full assessment of impact on heritage assets is set out in the Heritage section of the report. Officers have identified the following adverse impacts (indirect, via setting):
  - Low level of less than substantial harm to The Monument (grade I)
  - Low level of less than substantial harm to Tower Bridge (grade I)
  - Slight level of less than substantial harm (at the lowest end of the spectrum) to the Eastcheap Conservation Area.
147. For the reasons set out in this report, it is considered that there is clear and convincing justification for the proposed development. It would optimise the capacity of this site and deliver an essential contribution to the provision of required office space as set out in the office section of the report.
148. To optimise the site, while minimising harm, alternatives were explored throughout the iterative pre-app process including different massing profiles and elevational treatments and adjusting the positions of the upper pavilions to soften their impact on the Monument. While adverse heritage impacts have not been entirely mitigated, these are fleeting, considered minimised and clearly and convincingly justified; clear public benefits flow from the development to



outweigh the harmful impacts. As such, the proposal is considered to comply with D9 C (1; d).

149. In respect of D9 C (1; e) the proposal would be visible in relation to the Tower of London WHS as demonstrated by Views in the THVIA July 2023 and Addendum October 2024. The proposal has been found through detailed analysis, referred to later in this report, not to cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site, or the ability to appreciate it. This is by reason of its strategic siting within the long-established and consolidating Cluster backdrop, the intervening distance and height when viewed from in and around the Tower of London. The development would comply with D9 C (1; e).
150. In respect of D9 C (1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area. Rising to a similar total height as no. 20 Fenchurch street, and marking the southern height datum of the City cluster. Due to its location to the south west of the cluster, its distance from the river, as well as its strategically driven height aiming to consolidate the edge of the cluster, it would preserve the open quality and views of/along the River, avoiding a 'canyon effect' when seen in association with the London Bridge Cluster, in accordance with D9 C (1; f).
151. In respect of D9 C (1; g), the potential impact of solar glare from the proposed development is considered at its worse to be minor adverse but the effects are not significant, as discussed in the relevant section in this report. Further details would be requested as a S.106 obligation to require a detailed solar glare assessment to be submitted post completion but prior to occupation of the proposed development which would include details of a mitigation measures (if considered necessary), in addition to an agreed set of additional testing locations as part of the façade materiality to be secured through the S.106 obligation. The proposed development would comply with Policy D9 C (1; g) of the London Plan.
152. In accordance with D9 C (1; h), the proposal has been designed to minimise light pollution from internal and external lighting, which is inherent in the façade, and will be secured in detail via S.106 obligation on the the southern and eastern facades, which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would 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. The development would comply with London Plan policy D9 C (1; h).

### Functional Impact

153. Through the pre-app 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, these issues have been covered in more detail in the architecture and public access and inclusivity section of the report, and are considered to be in accordance with London Plan Policy D9;C;2;a.
154. The proposed servicing strategy would retain the existing vehicle access from Gracechurch Street into the newly formed public realm area, the Undercroft. This area functions as a dual-purpose area, making an efficient use of the available ground floor space. During the daytime hours (07:00 to 23:00), the area will be used as a public realm and open space and parking for the disabled people, whereas during overnight hours (23:00 to 07:00), it will be facilitating delivery, servicing, refuse and recycling activities. There are two servicing bays in this area to accommodate movements associated with the type of vehicle needed to complete such activities. Swept path analysis were undertaken, showing that the 7.5t (8m) box van can access and egress the loading bays. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience for surrounding public realm in accordance with D9 C (2; b). Further details in respect of the servicing approach are set out in the Transportation section of this report.
155. The proposed development creates several pedestrian access points, being the main access near the junction Gracechurch Street with Fenchurch Street and four other access points, three of which are situated along the Gracechurch Street and the fourth is from St Benet's Place. The area known as the Undercroft is attracting people from all four access points, channelling them through a few stairs and along the sliding doors to the café area and foyer. This area would be the main point of arrival for visitors of the elevated public spaces. The proposed Undercroft would allow a space for a security check in reception, which connects to a passageway leading visitors to the lift for the public spaces. The public rooftop spaces have been designed to accommodate 125 people with lifting, access and supporting functions designed around this expected occupancy. The double-height ground floor foyer and café spaces are generously sized to accommodate visitors to the café and public areas, allowing for internal queue management and security checks. This would comfortably accommodate peak time use, avoiding unacceptable overcrowding or isolation in the surroundings. This is in accordance with D9;C;2;c. For cyclists, two accesses have been created, the main is from Fenchurch Street and the other is from Gracechurch Street. A dropped kerb is proposed on Fenchurch Street to facilitate cyclists moving into the building, leading into a lift lobby are in the

building with three lifts that take cyclists to the basement cycle store area. Entrance to the ground floor foyer and café is achieved through drum sliding doors. A central staircase, the amphistair, and a set of escalators provide access to the office floors above with separate lifts provided on the ground level. The Undercroft area offers step-free access to the visitor passage or the café through accessible lifts. The final details of the entrances, amphistair and accessible lifts would be included in inclusion and accessibility conditions.

156. As discussed in the transport section of the report, there will be an uplift in pedestrian and cyclist activity on the wider transport network as a result of the development. The impact will require some interventions to the public highway which will be developed in detail as part of the S278 agreement. Such interventions comprise the widening of the footways and resurfacing of the public highway to improve walking, wheeling and cycling on Gracechurch Street and Fenchurch Street. The S.106 agreement will require the developer to enter into a S278 agreement with the City of London and the TfL to undertake any works to mitigate the impact of the development in accordance with (D9;C;2;d).
157. In particular, the provision of office floor space, the education floorspace, and the elevated public roof Garden and Sanctuary viewing gallery will promote the creation of jobs, services, facilities and economic activity and will act as a catalyst for future growth and change in the locale in accordance with (D9;C;2;e).
158. With the imposition of conditions, no adverse effects have been identified on the operation of London's aviation navigation and the proposals have also been found to avoid significant detrimental effect on solar energy generation on adjoining buildings (D9;C;2;f).

#### Environmental Impact

159. In regard to D9 C (3; a) the proposals have been found to provide safe and satisfactory levels of wind, daylight and sunlight and temperature conditions and would not compromise the comfort and enjoyment of the public realm at ground floor and private and public terraces of the building. In regard to (D9 3b-c), the design has given consideration for how the proposals can assist with the dispersal of air pollutants and which will not adversely affect street-level conditions or create harmful levels of noise from air movements, servicing or building uses, preserving the comfort and enjoyment of surrounding open space. Thermal comfort, pollutants dispersal and solar glare are analysed in detail elsewhere in the report. It is considered the proposal would meet the environmental considerations of Policy D9 C (3).

#### *Public Access*

160. The proposal would provide a striking new elevated public space at the crown of the building. This would provide striking views over central London to the west, south-west and south in the form of an elegant, curvaceous viewing platform incorporating a separate but linked Learning Space. It would be accessed through an intriguing and innovative sequence of public spaces, commencing with the 'Undercroft' at ground level. The proposal would fully accord with D9 (D).

### **Tall Building, Principle, Conclusion**

161. Overall, officers considered the site to be appropriate for a tall building and a strategic delivery site supporting the consolidation of the City Cluster. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9, Local Plan Policy CS 14 and all parts of emerging City Plan 2040 policy S12 except S12 (3) due to the minor breach of the proposed City Cluster contour lines. This conflict will be considered against the Development Plan as a whole as part of the Planning Balance.

### **Architecture**

#### **Existing Context and Building**

162. The existing building at 60 Gracechurch Street was built in 1996 and is formed of 9 above ground storeys, reaching a maximum height of 56.34m AOD. It sits within a complete urban block, and a continuous terrace of buildings along Gracechurch Street, all of which share front building line datums, and very uniform heights and roof setbacks, which work together to form a consistent and complete street. Similarly, there is conformity of building materiality through the use of Portland stone and masonry detailing, proportion and hierarchy, despite these buildings being of different ages and architectural styles. In urban design terms, the scale and proportion of the existing building, and the other buildings fronting Gracechurch Street which complete this edge of the block, are well-proportioned and exhibit good quality architectural detailing. The curved nature of the building on this prominent corner also helps to lead the eye, and pedestrian movement, around on to Fenchurch street. The curved form is also reflected in the design of 70 Gracechurch Street, which sits on the opposite side of the junction. Working positively together, the curves of these two buildings mark a legible gateway to Fenchurch Street, softening its edges, and enhancing the pedestrian experience of these streets.
163. The ground floor of the application site also offers legible entrances, and an active and human scaled ground floor, which is predominantly clear glazed allowing views into the building, in particular into the retail unit on the north west corner, which also provides an active frontage onto Fenchurch Street.

## Proposed design

### *Bulk, scale and massing*

164. The proposal is for a tower to be erected on the site of the existing building, rising at its tallest point to 162.30m AOD. It would be a dynamic piece of design, with distinctive and different treatments of its podium, tower and crown levels responding to its immediate and strategic contexts, and brought together into a unified whole.
165. Throughout the design process, consideration was given to a consented scheme at 55 Gracechurch Street immediately to the south, which would have screened much of the proposal from view in the cumulative scenario. In October 2024 the designs were amended by glazing and recessing the western third of the south elevation to optimise visual and physical separation between the two schemes. It is relevant to note that this consent has now expired and, as such, the proposals would not be screened to the south by another scheme, although the site of 55 Gracechurch Street remains in the City Cluster and a precedent for a tower scheme on that site has been established.
166. The tower has been designed to rise above and out of a base podium, which relates to the scale and materiality of the existing masonry buildings fronting Gracechurch Street. Above this, and an intermediary double-height layer at the top of the podium, the tower extends upwards, clearly dividing the form of the buildings into three parts – podium base, tower, and crown. The tallest point of the tower is its north eastern corner, with the height of all other corners descending from this point, to varying degrees. The form and massing of the buildings top, which fans into three layers of glazed pavilions to the south, and a lattice roof structure over the north, creates a distinctive and clearly expressed termination of the building, which can be appreciated at distance.
167. To the west, the massing of the tower element would be given volumetric articulation through the application of a diagonal run of external terraces, which would cleave the western elevation into two parts, the southern portion being slightly more recessed than the northern, in order to break up the western façade. The top of the southern portion of the building would be defined by a set of three tiered lightweight rooftop pavilions, which sweep back from one another to reveal a set of roof gardens, and at its top a green roof, reducing the massing of the top of the building, and giving it a layered and unfolding expression. From the south, these pavilions are set back a little from the leading edge of the elevation so they do not appear flush, and would be viewed stepping up in height from west to east, with the angular solid top floor rising to its pinnacle to the east behind.

168. The alignment of the northern façade of the tower element would taper to the southwest, to reduce to overall length of the western façade, and as such not run parallel to the podium frontage below. The top of the northern elevation would also taper down in height to the west, giving the top of the building a dynamic, angular silhouette. The descending massing at the top of the building from the northeastern corner also follows around on the eastern façade, though the degree of decline is less severe, and the end steps down to the flat top of the final roof pavilion.
169. The massing of the podium would expand, and step forward of the existing building, and its neighbouring building's frontages between levels 2 and 5, and 8 to 36 above. Geometrically, the corner would also be treated differently, through the use of a chamfer, rather than a curved radius to the corner, as existing. Another point of difference is the introduction of the "Undercroft" which would operate in a hybrid fashion between publicly acceptable space in the day time, and a servicing yard overnight. This would therefore create a large, double height, opening at the base of the building on Gracechurch street and provide a covered space that people can use during the day.

#### *Expression and materiality*

##### Podium:

170. The design intent of the base of the podium is to provide a more human scale and relatable ground floor experience, while also providing a strong grounding for the tower above. It is also essential in continuing the townscape and street frontages along Gracechurch Street which have a clear, consistent and highly cohesive townscape composition. As such, the podium base is composed into a hierarchy of three layers, all of which would be primarily formed from a precast concrete façade frame with large aggregate of a warm tone to create a textured, varying and human-scaled smooth finish.
171. At its base, the ground floor expression would be double height, with widely spaced columns supporting the floors above. In-between these, on the north western corner, would be full height clear, flush glazing (with integrated HVM within its base stallriser). All glazing would utilise an internal frame, including the buildings primary entrance, giving the glazing a sleek elegant appearance. The specification of the glazing will be conditioned to ensure it remains clear, transparent with low levels of reflectivity, to ensure optimal visibility to the café proposed on the ground floor will be visible externally, and fully publicly accessible. The design of the entrance doors will also be conditioned to ensure they are fully inclusive of a range of users, and positively facilitate engagement with the café use, which is a critical component of the public offer and closely related to the success and animation of the undercroft public space.

172. Regardless of the facade type on the ground floor street fronting elevations, the façade line would align with the back of the columns, providing depth, and enabling three faces of the columns to be articulated with an additional layer patterns or geometric modelling – to be captured via condition. On Gracechurch street there would be two full glazed bays, and three left open as the threshold to the undercroft public space within. Above this opening at first floor level would be a glazed mezzanine floor for the office, which would appear suspended above the entrance to the undercroft. The proposed soffit of the undercroft would be scalloped to tie in with this motif used across other elements of the building. Nevertheless, full details of the Undercroft’s soffits, spandrels and overall bay design, including materially, finish and illumination, of this will be reserved for condition to ensure that its design reinforces the expression of an entrance to the undercroft, and that this will be a welcoming and inclusive space. And, with respect of the first floor office level elevations, while being of high quality, would remain subservient to and part of the language of the public space below them.
173. To the north along Fenchurch Street there would only be one full height glazed bay to the east of the entrance, a second glazed bay with first floor spandrel with cycle entrance. The final two bays on this façade would have solid ground floors set behind a small, planted edge. The ground floor facades of these are indicated to be designed to facilitate climbing plants, to green this edge of inactive façade.
174. The rear facade fronting onto the private courtyard next to 2-3 Philpot Lane, in addition to the passageway of St Benet’s Place would maintain the solidity of the existing building at ground floor level in addressing these spaces.
175. The middle portion of the podium would incorporate 4 floors of offset bays, set across a 3x3m grid which would be divided horizontally by full height vertical piers, and glazed windows. The piers have been designed to be 3-dimensionally modelled, curving between planes to create a dynamic visual rhythm. The horizontal bands at each floor level would also be modelled and scalloped/curved. Windows would have concrete headers. On the chamfered corner, the podium design incorporates balconies set within the façade framing system, which would include planters such that the soft landscaping would be an integrated feature of the design, and soften this corner. Due to the projection of the podium in front of the prevailing building lines of neighbouring buildings, the corners have been design to incorporate glazed windows, so that the 1.5 projections on the flanking elevations, which would be readily apparent in the street scene, are not blank.
176. The top of the podium, levels 6-8, would be a set-back double height predominately glazed area of façade. The design intent is for these floors to

bridge together the architectural languages of the tower and podium, and as such these floors are marked by a line of structural columns, with glazing set behind. The columns have been designed to curve laterally, following the scalloped geometry established elsewhere across the façade. They would be light colour precast concrete. The leading edge of level 6 would also incorporate a line of planters, again to soften the shoulder datum and provide greening and visual interest to the street frontages. Details of planting and balustrades across the entire building would be reserved for condition.

177. Overall the proposed materiality, rhythm and order of the podium base would be acceptable, and compatible with the urban context, being formed of similar robust materials, that offer opportunities for finer embossment, detail, and tactile engagement. The podium façade would also offer dynamic visual rhythm, which would be unique to the street frontages. Notwithstanding the proposed drawings, detailed bay studies at 1:20 demonstrating junctions, drip details, reveals, materials, texture, finish and colour will be conditioned, to provide greater clarity and ensure the proposed elevations are of adequate design quality.

Tower:

178. The elevations to the tower element would be united in the application of a 1.5m wide façade grid framed by projecting pale toned aluminium mullions and transoms. The ventilation of the building would be integrated into the facades as drawn, in details to be secured by condition. The typical bay system used across the majority of the tower element, is set across two floors, giving the elevations a subtle vertical emphasis. Where the horizontal lines cap the module, the projecting transoms would be curved or scalloped, to provide additional modelling and articulation. Typically, the double height modules are offset from one another, proving greater variation across the facades. While the application of this aluminium grid system is the uniting element of the tower, its scale and rhythm would vary on each of the buildings four facades, in addition to the materiality of the panels within their frame, which would either be solid aluminium or transparent glazing.
179. On the northern elevation, all bay modules would incorporate panels of full height glazing within their frames. The eastern third of the elevation would continue this format, but double the scale of the system, so that the bays move to being 3m wide and 4 storeys tall. This jump up in scale would help to provide additional variation and interest to the tower and would help to reduce the overall bulk and mass of the tower though emphasising its verticality through the vertical subdivision of the elevation. The top of the northern elevation would be finished in curved perforated aluminium panels, in two different colour tones,



to accentuate the angular character of the top of the building, and screen the plant enclosure behind.

180. The east and two-thirds of the south elevation would be largely solid across the body of the tower, owing to the position of the core of the building against the east elevation and the party wall conditions in these areas which have led to the applicant's preference for solidity. This is recognised as unorthodox for a tower proposal, with the extent of solid wall created by such factors typically much more limited, and is only considered justified by the innovative proposal for a façade system that would create subtly rippling surfaces of light and shadow, similar to the properties of glass, to lend interest and animation to these parts of the building, details of which are set out below. This system, which is to undergo extensive design refinement and scrutiny through S.106 obligation, is considered to have the potential to create a unique architectural moment in the Cluster.
181. The eastern elevation would be broken down into three vertically expressed bays, each with a slightly different order to create visual interest. With the exception of the lightweight glazed roof top pavilion which would sit on top of the southern portion of the elevation, all other bays from ground level to floor 36 would be solid, and for the tower element would be made from light coloured metal, with subtle architectural articulation lending the elevation a metallic, filigree quality, though the final details of the appearance and finish of these bay panels is proposed to be secured through the S.106 agreement. In terms of their articulation, the northern bay would match the double order of the north eastern façade, so that the corner is wrapped with the same scaled framing, though its visual appearance would differ considering the differences in the visual properties of glass and metal. The central portion of the facade would return to the smaller offset grid pattern, and again be infilled by metal panels.
182. The final, southerly portion of the east façade would be separated by a channel of panels, and use a slightly different panelling system. In this system there would be three layers to the bay module, a back panel, a middle fascia panel, and an external metal or glazed angled fin. Throughout the elevation the angles of the outermost fins would be subtly varied so that the overall effect would be to create a subtly reflective surface of rippling light and shade. This system would offer flexibility, with the materiality of all these elements and the angling of the outermost fins to be tested, modified and adjusted as required to refine the appearance of the façade and secure the optimal patterning of light and shadow during the development of the detailed design which would be secured via S.106 agreement.
183. In addition to the final materiality and appearance, the obligation would control the advanced testing of materials and what methodologies are required to

assess their visual appearance, in particular to understand the visual properties of the materials, and how these are affected by their base material, finish, location and angle of their application, and how combined these work together to transpose a patterned appearance across the expanse of the eastern (and southern) façade which can be appreciated in varied atmospheric conditions and at night. Such examples include, but would not be limited to the erection of physical models, AVR3 photo imagery, kinetic videography, and full-scale bays mock up panels, to ensure the overall façade would appear dynamic, in varying light conditions, and deliver on the promise of this angled fin system and the principles set out above.

184. The top floors of this elevation would also be finished in perforated metal panels, concealing the plant enclosure behind. It should be noted that the eastern elevation, which in effect is the buildings rear, and benefits from greater levels of enclosure and screening than the other three elevations, would still be highly prominent in views. In particular, in views looking westwards along Fenchurch Street (View No. 08), and also from the windows of other tall buildings within the Cluster, in particular from 20 Fenchurch Street – and the public viewing gallery/garden at ‘sky garden’ (Views 3 a,b,c of the HTVIA), directly opposite, which would enable the elevation to be read in its entirety, by day and by night, in addition to a number of other high level public viewing platforms, such as 120 Fenchurch Street.
185. The southern elevation would also be made up of three vertical bays, each divided by a thin channel of visually recessive metal panels, and topped by the stepping, lightweight glazed rooftop pavilions. The western third of the elevation would be glazed and stacked in double storey increments with the 1.5m grid expressed externally by projecting fins. This façade module type would wrap around the south western corner of the tower onto the west elevation, helping to unify the design. This western third of the elevation would also be inset from the building line by 1.5m, helping to break up the bulk of the façade.
186. The other two thirds of the south façade are proposed to be clad in light coloured metal panels, using the same triple layer ‘fin’ system as described above. Like the pavilions, each of these three vertical bays would step up in height sequentially by a storey, with the tallest being on the east. The double height module would also be offset, such that the slim scalloped horizontal bands are staggered. As above, the intention of the proposed use of angled glazed and/or metal fins on these areas of the elevation is to create a subtle interplay of light and shadow across the façade over the course of the day, in order to bring visual relief and interest to these areas of solid façade. Final details relating to materiality, solidity and transparency, and the arrangement and angle of fins, are to be agreed via S.106 agreement in order to optimise the visual interest of the elevation, given how highly prominent the southern

elevation of the tower would be in both local and strategic views across the Thames towards the City Cluster, by day and by night.

187. The western elevation, divided by the reclining diagonal spine of terraces, would utilise two façade module types. The northern portion of the façade would appear to be more solid, though the application of the typical aluminium framing system with larger vertical piers. The southern portion, which wraps around the south western corner as described above, would be more glazed with far slimmer vertical piers. The differences between these two systems in terms of their ratio of solid to void would accentuate the intentional division of the façade into two elements, and thereby assist in reducing the massing of this extent of westerly façade, though breaking it down into two smaller elements of familiar but distinct architectural textures. The external terraces which form the seam of this divide would share the same scalloped geometries both in plan form, and in the modelling of the horizontal structure. Planters would be integrated within the structure of the terrace in front of the balustrade line, with details of both to be secured by condition, to enable planting to be seen from street level and define a green edge to these external spaces to reinforce their importance as a fully integrated part of the architectural design of the tower.
188. The fifth elevation and top roofscape of the tower would feature an extensive green roof at level 36, and to the north, screening the plant enclosure and PV array, an open latticed architectural frame of matching colour and appearance to the other faced elements, so that when seen in longer views would become a unified and unique 5th elevation of the building, commensurate with other articulated tower roofscapes within the City cluster. BMU equipment would also be located within this roofscape, and be fully screened from view when not in use for facade cleaning and maintenance.
189. The extent of solidity across the east and two-thirds of the south elevations would be unorthodox for a tower proposal. In this case, the proposed solidity is driven by the party wall conditions with the sites to the east and to the south, particularly the now-expired consent for a tower on the site to the south. This unorthodoxy demands an innovative design response, and officers are satisfied that the proposed 'fin' façade system, through its architectural articulation and intricate patterning of light and shade, would deliver visual interest and relief across these elevations with the final details, and opportunities for glazed elements, optimised via S.106 obligation. A full architectural façade lighting strategy will also be reserved for approval via S.106 obligation, to ensure the dynamism of the façade system is experienced in lower light conditions, and as such becomes a complementary feature of the London skyline by night, given that much of the southern and eastern facades will no benefit from any interior lighting or the reflective qualities of glass like other towers in the Cluster.

190. The expression and proposed materiality of the north and western elevations are considered to be of a high architectural quality, commensurate with other towers within the City cluster, and in addition to the flexibility of the triple-layered panel system proposed for the southern façade, when taken in the round, is considered to accord with Local Plan Policy CS10 and DM10.1 or DE2.

**Public realm:**

191. Streetscape enhancements: The proposal includes enhancements to the streetscapes along Gracechurch Street and Fenchurch Street, which would be detailed under a S.278 agreement. These include widening the footways along both streets, and formalising the temporary street widening works currently in place, which would entail levelling the pavement surfaces with York Stone pavers, and instating permanent granite curbs, in line with City of London Highways specification. Due to the high pedestrian footfall along these streets, no planting is proposed. However, opportunities to introduce resting spots at 50m increments is proposed to be scoped into the S.278 works, to ensure these streets and the approach to the building reaches a high level of inclusivity and accessibility. Furthermore, no hostile vehicle mitigation (HVM) is proposed within the public realm, as this is proposed to be integrated into the architecture of the building.
192. The Undercroft is a proposed new area of publicly accessible semi-external space within the ground floor of the building, to be used in a hybrid fashion; as a public space during the day, and as the buildings servicing bay over-night. Despite being only a single storey, its floor to ceiling height is tall, making the volume of the space generous. Its use as part of the public realm would be assisted though the inclusion of tables and chairs – and other areas of seating, in addition to the complementary provision of a café with the ground floor of the building. Access to the café would be via a flight of stairs to the north and/or a lift. The internal elevation to the office building lobby and café would be clear glazed, enabling direct views to the café inside. The details of entrance doors will be reserved for condition, however at the design intent is for access to be provided by a drum door, which is welcome as revolving doors are inaccessible to a range of people. The extent of level changes north to south would preclude inclusive access via a ramp, which could not be accommodated without compromising other ground floor functions. Full details of the lifting strategy, and its management will be conditioned and secured in the S.106 to ensure inclusive access to the ground floor.
193. The Undercroft would also feature a number of generous sized planters (in depth and width) both within its interior, and lining the edge of Gracechurch street. The size of these would be able to accommodate a high density of planting, in addition to some taller feature species, to give the space a strongly

biophilic character; soften the hard surfaces within; and enhance the thermal comfort of the space. A shade tolerant planting palette would be used to ensure year around seasonal interest and enhanced biodiversity. A number of climbing plants are proposed to grow up columns and vertical surfaces. Planters would form part of the HVM strategy and as such are made from concrete of the same pallet at the podium above. Full details of the landscape designs, including planning specification, and strategies for urban furniture, plant lighting, and architectural lighting and hard surfaces, will be conditioned to ensure the designs are of a high quality and resilient in this context.

194. To the south east of the Undercroft is the provision of a blue badge parking bay. The east far wall of the undercroft would be a raised area dedicated as a security check point during the day time before ascending to the level 35 roof garden and associated café and learning room, accessed via the corridor passageway. Another lift is proposed here to facilitate step free access to the roof garden. However, this raised area would be shared and an essential part of the servicing strategy, and as such its management and maintenance will be detailed and conditioned within the inclusive access management plan, and the servicing management plan, to ensure the lift is fully operational for public use. These management plans would also detail how the Undercroft will be managed, maintained and cleaned to ensure the space is a welcoming and clean space for people to use. The specification of hard landscaping, which must be resilient, easy to clean, of high quality, and inclusive - with full details of tactile paving and the demarcation of the blue badge bay, will also be secured via condition.
195. The corridor to the roof garden lifts, known as the Passage, would be a fully designed interior walk way, lined with arched forms and walls incorporating information on the history of the site. At its end next to the lift would be a small seating area. Details of the internal elevations and journey experience will be secured via condition.
196. Local Plan policy DM10.3 and emerging City Plan policies S8, S14 and DE5 seeks the delivery of high quality, publicly accessible roof gardens and terraces with high levels of urban greening. Public access to tall buildings within the City is important in creating an inclusive City. The proposed public roof garden at level 35 has been designed as a quiet contemplatory space which would enable views to the west over the city, offsetting the obstruction of this viewing experience that the tower would cause to the viewing garden at 20 Fenchurch Street. The external terrace would have good ratio of soft to hard landscaping, and a number of seating options. The specification and seasonality of which, taking into consideration the climatic conditions of this location, is to be approved via condition. Internally, at this level there would also be a café kiosk to enhance the amenity of the terrace. A learning space is also proposed on

this floor, in addition to a bank of toilets. Details on the proposed glass balustrade enclosing this space, and other private terraces will be conditioned to ensure they adequately mitigate environmental conditions to ensure the highest possible levels of thermal comfort, and best practice on suicide prevention is met. Equally, a condition on the design and location of terrace entrance doors will be required to demonstrate these are appropriately located in respect of wind conditions, so that access to the public terrace will remain inclusive and accessible for the public to use throughout the year.

### **Delivering Good Design and Design Scrutiny**

197. Officers consider that the application process has adhered to the intentions of London Plan D4 Delivering Good Design.
198. In respect of D4B, the pre-application process including formal meetings, workshops using visual tools and site visits and as applied a holistic lens to the design analysis to optimise the potential of the site. Officers with expertise in sustainability, microclimate, daylighting, policy and land use, accessibility, heritage, archaeology, urban design, public realm, transport and urban greening have been engaged and shaped the final application proposals.
199. A development carbon optioneering process has been followed which has had external scrutiny and is set out elsewhere in the report. At an early stage, transport and pedestrian data informed options for the service route layout, cycle routes and public realm development officers. Environmental microclimate, daylight and sunlight analysis informed the massing and design treatment as well as the public realm and landscaping. Wider engagement by the applicant is set out elsewhere in the report.
200. Part D4 C has been met and a detailed design and access statement has been submitted.
201. In respect of D4 D, the proposals have not been referred to an independent design review but have undergone a rigorous local “borough” process of design scrutiny as required by the policy. In addition, the applicants undertook preapplication engagement with the Historic Royal Palaces, St Paul’s Cathedral and Historic England.
202. In relation to D4 E, parts 1-6, there has been a “City” level of scrutiny comprising extensive officer topic-based reviews over multiple preapplications; external input has been provided by other experts as set out above; feedback has been recorded and provided to the applicants; the evolution of the proposals is summarised in the DAS; and within the Committee report.

203. In relation to D4 F, parts 1-4, officers have been mindful to ensure that building heights, land use and materials for the buildings and the landscape are stipulated on the drawings to minimise ambiguity. Because the innovative 'fin' façade system is an unorthodox, yet potentially promising proposal, a bespoke process of detailed design development and refinement has been set out through conditions and S.106 obligations to ensure that the detailed designs deliver on its promise. More generally, the recommendation is also supported by a robust relevant condition to ensure the scheme is implemented to an exemplary standard.
204. Overall, the application process has adhered to the intentions of London Plan D4 Delivering Good Design and officers consider that the relevant parts of the policy have been complied with.

### **Conclusion on architecture and public realm design**

205. Officers consider that the proposal would result in a unique piece of architecture with its own identity, with a prominently visually permeable ground floor frontage, and increase in ground level public realm through the inclusion of the undercroft area, which would become an integral part of the arrival experience to the roof garden. While reserving further details of the principal southern and eastern tower elevations for S.106 agreement, officers consider that the architectural design of the building would be compatible with the existing context, being read as a well-layered piece of design, which expands ground level public realm.
206. The proposals would enhance the landscaping of the site and adjoining streets, providing richer and more dynamic planting and greater opportunities for sitting within the undercroft. The proposals would therefore enhance the overall quality and character of this section of Gracechurch Street.
207. The architecture and urban design proposals comply with Local Plan Policies CS10, DM10.1, DM10.3, DM10.4, DM10.8 and DM19.1 emerging City Plan Policies S1, S8, DE2-8, HL1, and London Plan Policies D3, D4 and D8, paragraphs 130 and 132 of the NPPF and the City Public Realm SPD all require high-quality public realm and increased urban greening.
208. 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 employment growth and would increase the amount of high-quality office space. The proposals align with the function of the City to accommodate substantial growth in accordance with Local Plan Policies CS1: Offices and London Plan Policies SD4, SD5 and E1.

## Strategic Views and Heritage

209. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13, emerging City Plan 2040 policies S12 and S13, and the City's Protected Views SPD, 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, which provides guidance on the protection and enhancement of views of historic City Landmarks and Skyline Features, including securing an appropriate setting and backdrop to the Tower of London (WHS).
210. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents. A THVIA Addendum dated October 2024 was submitted to assess the effects of post-submission design amendments and includes a set of updated views and a number of additional new views. Of the 34 views originally submitted, 10 verified views were updated in the THVIA Addendum including Views 9, 10, 11, 12a,12b,12c, 14, 16, 18, 33, and 6 new nos 35 – 40 have been added. It should be noted that not all views have been updated to reflect the changes to the southern elevation, in particular views 34a and 34b which take in the Monument, although officers consider that the original and amended submissions together allow for full assessment to be made. As set out above, one-third of the east and two-thirds of the south elevations would be clad in the innovative 'fin' façade system which would employ angled metal or glazed panels to create rippling light and shade to provide visual texture and relief. These have been shown in the renders, with final details of the system to be secured via condition.
211. The views selection was informed by extensive testing. The split of view visualisation types (render, wireline, and computer-modelled representation) is based on the proximity and sensitivity of the views, to represent the impact of the proposed development.
212. For clarity, the consented tower scheme at 55 Gracechurch Street (ref: 20/00671/FULEIA), the adjoining site to the south, has been removed from the cumulative and future baseline views imagery in the most recent, amended submission as this scheme has not been implemented, and its planning permission has expired.
213. Consultee responses and objections have been received from Historic England, Historic Royal Palaces and London Borough of Tower Hamlets, based on the first submission, which relate to the impacts of the proposed tower on strategic views and the outstanding universal value of the Tower of London World heritage site, and best practice in terms of impact assessment in



accordance with policy guidance for Impact Assessments in a World Heritage Context (2022). These are referenced and discussed in detail below.

### **Tower of London World Heritage Site**

#### **OUV and Relationship to Setting:**

214. The seven overarching attributes of Outstanding Universal Value which are contained in the Statement of Outstanding Universal Value, itself contained in the World Heritage Site (WHS) Management Plan, have underpinned this assessment, alongside the components contributing to each attribute. It is considered that three attributes are of particular relevance to assessing the impact of the proposal: i.) an internationally famous monument; ii.) landmark siting; and iii.) physical dominance of the White Tower.
215. Whilst the Tower of London comprises a scheduled ancient monument, and various listed buildings and is in a conservation area, it is considered proportionate and robust, in the circumstances of this case, to consider the impact on OUV in order to draw a conclusion on these assets.
216. The WHS Management Plan establishes a 'local setting area', an 'immediate setting' and a non-spatially defined 'wider setting'. The proposal is not in the designated local setting (as identified in Figure 4 of the WHS Management Plan) but is in the wider setting. The Local Setting Study (section 7) identifies the main views and/or viewpoints to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints include a number of LVMF viewing locations, all of which have been used to assess the impact of this proposed tall building.
217. The Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the commercial centre of the City of London (at paragraph 2.4.25) and that the relationship between the ToL and the Cluster is long-established, forming a backdrop in views, including over buildings in the Inner Ward. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. The Management Plan, at paragraph 7.3.27, states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS will continue to need to consider i.) their effect on the established Cluster ii.) the space between it and the ToL and iii.) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.
218. The assessment uses the assessment framework in the Mayor's 'London's World Heritage Sites: Guidance on setting' SPG, which is based on the relevant

UNESCO's guidance, including the impact tables at Appendix 3 and 4, in conclusion.

219. Consultee responses have been received from Historic England and Historic Royal Palaces raising concerns over the impact of the proposals on the WHS and ToL, in addition to an objection from London Borough Tower Hamlets (LBTH) who contend that the proposals would harm the setting of the ToL.
220. Historic England have suggested that the proposal 'could' have a harmful impact on the WHS and that the original submission did not adequately assess the impact of the proposal in the OUV of the WHS; in the amended submission a full HIA has been provided by the applicant. Historic England have subsequently responded to the amended proposals with the view that the proposal would cause harm to OUV and specifically to the attributes Landmark Siting and Concentric Defences.
221. Whilst officers give the views of these stakeholders significant weight, officers reach a different conclusion to Historic England, Historic Royal Palaces and and the LB Tower Hamlets on the proposal and conclude that there would be no harm to OUV as captured in views 10, 11, 12a.12.b.12c, and 36 of the HTVIA July 2024 and HTVIA addendum October 2024, for the reasons set out below.
222. The proposal would be visible within, and would therefore result in a change to the wider setting of the WHS. However, change is not necessarily harmful. Views, including those identified within the LVMF view management framework, and ToL Local setting study, where the proposal will be experienced in conjunction with WHS are identified and assessed below.

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

223. This is also identified as a Representative View in the Local Setting Study (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge).
224. The LVMF SPG identifies that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued. It also states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background, include the

Canon Street Station towers, BT Tower, Centre Point and the Tate Modern (paragraph 182).

225. The visual management guidance anticipates the consolidation of the Cluster which it is deemed will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (paragraph 187). The guidance also states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground; that guidance applies, in particular, to the Monument (paragraph 185). The visual management guidance also states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (paragraph 186).
226. In this view the proposal would appear to the west, and mark the western periphery of the Cluster, sitting adjacent to and partly occluded by 20 Fenchurch Street (AKA the Walkie talkie), and at a considerable distance from the ToL. The south-east corner of the proposal would form an interesting new bookend to the western side of the Cluster, with the rippling elevations on the south-east corner subtly reflecting light and shade below the building's distinctive crown.
227. Officers consider that the characteristics and composition of this viewing experience would not significantly change as a result of the proposals, given the intervening distance between the proposal and the ToL, the existing presence of 20 Fenchurch Street within this view and the way it would partly occlude the proposal. In this location, the proposals form, scale and massing would complement and consolidate the Cluster as a distinct skyline, where its stepped roof gardens and lightweight pavilion top floors would be seen to form a layered roofline and its south elevation would form an interesting bookend to the Cluster.
228. Appearing at a considerable distance to the west from the focus of the ToL in the foreground, the WHS would not be obscured, distracted from or dominated. Given the intervening distance, siting, scale, form and appearance, the proposal would not compromise those relevant attributes of OUV. It would leave unaffected those relevant components which also form part of the LVMF visual management guidance – the physical form and visual dominance of the White Tower, the iconic sky-etched silhouette, the close relationship to the River Thames and City beyond in the background, in accordance with the visual management guidance in the LVMF SPG (paragraphs 183-186).
229. Furthermore, the consolidation of the Cluster into a more coherent, clear and discreet form, contrasting with the preeminent tower in the foreground setting

of the river would reinforce and make more legible the relationship between two related skyline identities, which is an important aspect of the understanding and appreciation of its OUV. The tower, and its concentric defences, would still read as a powerful defensive structure strategically sited to preside over the river, designed to be distinct from the City and its surrounds.

230. Equally, from this vantage point, the proposed building would preserve the observer's ability to recognise and appreciate the relevant Strategically Important Landmarks, the ToL and St Paul's Cathedral and would not obscure an appreciation of the scale and geography of London, including the Monument, in accordance with the visual management guidance in the LVMF SPG.

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

231. This view is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of the view is the ToL, which is the sole Strategically Important Landmark, inclusive of a Protected Vista, the Landmark Viewing Corridor of which is focused on the White Tower, benefiting from a dynamically protected sky-backed silhouette between the three Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (paragraph 413). The visual guidance acknowledges the long-established presence of the consolidating City Cluster in the view which, alongside those historic landmarks, reflects over 900 years of London's development (para 410). The juxtaposition of the WHS with the modern city and of built elements from a variety of eras is deemed a central characteristic of the view (para 411/413), and its rich variety of landmarks including City Cluster towers such as the Gherkin and Tower 42.
232. Given the pre-eminence of the River Thames in the foreground, the openness of the ToL ensemble defining its north bank, and the significant intervening distance between the ToL and the proposal, which would be on the western periphery of a consolidating Cluster, it is not considered that the proposal would undermine the composition and characteristics of the view or those landmark elements. The south-east corner of the proposal would form an interesting new bookend to the western side of the Cluster, with the rippling elevations on the south-east corner subtly reflecting light and shade below the building's distinctive crown. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City and not lost in it.
233. The siting, height, and scale, set a significant distance from the WHS and would respect the setting of the Tower and not dominate it, in accordance with LVMF visual management guidance at paragraphs 414-415. The proposal would

preserve the relevant attributes of OUV and those associated components. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct juxtaposing urban forms, in accordance with the visual management guidance (paragraphs 57, 418-422) and guidance contained in the Local Setting Study.

*LVMF View 11B.1-2, River Prospect, London Bridge (Downstream)*

234. This view is also identified as important in the WHS Management Plan and the Local Setting Study (Representative Viewpoint 11). The ToL WHS is identified as the sole Strategically Important Landmark, whilst Tower Bridge and HMS Belfast are identified amongst other landmarks.
235. Given the pre-eminence of the River Thames in the foreground and the significant intervening distance between the Tower of London and the proposal, which would be on the western periphery of a consolidating Cluster and only just within the viewing frame to the west, it would not undermine the composition and characteristics of the view or those landmark elements. It would allow the observer a recognition and appreciation of the ToL as the Strategically Important Landmark.
236. The proposal would not affect the clear sky backdrop of the White Tower and would not impose itself on it, given the intervening distance and separation in the field of view, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components – preserving the relationship with the River, the City, and the iconic form, ‘dominance’ and silhouette of the White Tower.

*Inner Ward, Tower Green and the Scaffold Site*

237. The LSS states there is a range of views from within the Inner Ward and the identified Representative View 1 is the Scaffold Site. These views are deemed by the Local Setting Study to illustrate the ToL’s significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. It aims to maintain views illustrating the living tradition of the ToL, its rich ceremonial life and unique sense of place apart from the modern city outside the walls, where the relationship between the scale of the individual buildings can be appreciated. Under ‘key issues’ it states tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or could affect the scale of the enclosing

historic buildings – qualified in the associated ‘Objectives and Guidance’ development should i.) respect that sense of place and ii.) ensure the buildings surrounding the Inner Ward remain the focus of the view.

238. These viewing experiences have been assessed in a three-dimensional model and within view 12a from the HTVIA. The proposal would, on the whole, be hidden behind the western range of enclosing buildings, having no visual impact. From views nearer the White Tower looking towards the Chapel of St Peter ad Vincula, the proposal would be seen rising next to 20 Fenchurch Street as a distinct, non-prominent feature at significant intervening distance, appearing as part of the emerging long-established Cluster backdrop. Only in very minor fleeting glimpses would a sliver of the south eastern corner of the proposal breach the silhouette of the Chapel, sitting in the sky space between the western range buildings roof tops and 20 Fenchurch street. Moving toward the Chapel, in its immediate setting from the green, the proposal followed by the rest of the Cluster moves out of view and it is unchallenged and pre-eminent.
239. In accordance with the guidance in the Local Setting Study the proposal would i.) respect the distinct sense of place and the pre-eminent stage in which those rich traditions would continue to take place and ii.) allow those enclosing Inner Ward buildings to remain the focus of the observer. It is considered the iconic, strategic landmark siting and dominance of the White Tower would be unchanged in terms of the overarching attributes of OUV while the relationship between the ToL set away from the City beyond would be maintained, the proposal being a proportionate addition to the emerging Cluster as a distinct long-established backdrop entity.

#### *Inner Curtain Wall (South)*

240. Local setting study view 4 recognises that this view is a 360 degree experience, the aim of which is to maintain an appreciation of the ToL as a riverside gateway, the historic relationship between the ToL and the River. The associated guidance seeks to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond.
241. The proposal would again appear adjoining 20 Fenchurch Street to the west of the White Tower, and when viewed alongside 50 Fenchurch Street (under construction) and 1 Leadenhall (consented), would assist in consolidating the Cluster’s distinct urban form and separate long-established identity. The White Tower, accentuated by its fortified massive masonry crenelated walls, would remain the focus of the view from the Inner Curtain Wall. It would continue to dominate the scene while that relationship with the River and an appreciation

of it as a historic gateway would be undiluted. It is considered that those identified relevant attributes and components of OUV would be preserved and the visual management guidance in the Local Setting Study would be complied with.

#### Inner Curtain Wall (North)

242. The Local Setting Study, in assessing views from the north Curtain Wall acknowledges that this is a 360-degree experience and demonstrates a clear contrast between the historic Tower and the modern city outside its walls. The identified aim is to i.) maintain views that reveal the relationship between the Tower and the City and ii.) maintain an appreciation of the defences as an outstanding example of concentric castle design. Under 'Key Issues' it recognises that future tall buildings could reduce the perceived prominence of the Tower in its setting stating that such buildings, under the associated guidance, should continue to reveal the historic relationship of the Tower of London and the City to the north and that clear views of the concentric curtain walls should be preserved.
243. The proposal, sited a considerable distance to the west of these views, adjoining and subduing the isolated eye-catching form of 20 Fenchurch Street would, as acknowledged by Historic Royal Palaces and Historic England, appear on the western side of the established Cluster, consolidating its distinct form, whilst preserving that relationship with the Tower of London. The concentric defences would remain pre-eminent and an appreciation undiluted in these views under the baseline and cumulative scenarios, also in accordance with the guidance.

#### Other Views

244. Selected other WHS views have been considered, proportionate to the siting of the proposal on the far side of the Cluster. The view from the riverside walkway of Tower Wharf, looking towards St Thomas's Tower containing the Traitors Gate, demonstrates the relationship between the emerging City Cluster in the background and the ToL which, in this moment, is 'towering' over the immediate foreground. Historic England have identified harm arising in this view, specifically to the attribute 'Concentric Defences'.
245. In this view, approximately only the top 5th of the building would be visible next to 20 Fenchurch Street, and officers consider that the proposal would reinforce the relationship between the two distinct urban forms – the Cluster and the ToL ensemble, which would dominate in the immediate foreground, causing no harm.

*Conclusion – Impact on Tower of London World Heritage Site:*

246. The proposal would preserve those attributes of OUV (and their relevant components), which have been identified in accordance with Local Plan Policy CS12, CS13 (3) emerging City Plan Policy S11, HE1, HE3 London Plan Policy HC2 HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and the CoL Protected Views SPD. The proposal would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF as it relates to OUV.
247. Historic England, Historic Royal Palaces and LB Tower Hamlets have raised concerns about the way they perceive the proposal would add to the bulk of the Cluster, which they assert as a distracting presence could or would cause harm to the WHS. Historic England have raised subsequent concerns as to how the innovative ‘fin’ façade system could pose a distraction in the views. Officers disagree with these conclusions whilst attaching great weight to the views of these stakeholders; put simply, the proposal’s location on the far side of the Cluster would make it an extremely recessive presence in views of and from the WHS, with the intervening main form of the Cluster far more obvious. The proposal would appear on the extreme periphery of the viewer’s eyeline when observing the WHS, or would simply not be noticed by them. Furthermore, the proposed façade system would be refined, under strict scrutiny and robust testing and sampling of materials, through the S.106 obligation, as described above to ensure that its presence would be appropriately subtle in these long-range views. The proposal would amount to comparatively modest consolidation of the Cluster’s existing form, would not fundamentally alter the Cluster’s visual relationship with the WHS, and would give the Cluster an elegant western bookend.
248. As such, it is considered in all instances that the overall impact would not harm the attributes of the OUV or any of the components, authenticity or integrity of the WHS, preserving its significance. In line with Section 6 of the SPG, the height, form and detailed design of the proposal has been amended to mitigate the impact, ensuring the proposal would read as part of the emerging coherent Cluster form, which it is established is intensifying and forms a long-term backdrop to the ToL ensemble. It is the view of officers that the proposed development would not harm the significance of the Tower of London whether in relation to the WHS, the individual listed buildings, or the Scheduled Monument.

*London View Management Framework (LVMF) Impacts*



- 249. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the capital's identity and character at a strategic level.
- 250. The site is located on the south-western periphery of the City Cluster of tall buildings, which the LVMF SPG visual management guidance seeks to consolidate to reinforce its long-established positive role on the skyline of the Capital (paras 57 / 87 / 129 / 130 / 144 / 146 / 187).
- 251. Being in the City Cluster of tall buildings, the proposal is sited to avoid breaching designated Protected Vistas towards Strategically Important Landmarks (SILs), including of St Paul's and the Tower of London (ToL). However, it would be visible from several assessment points, these are discussed below.

*London Panoramas and Townscape Views*

- 252. Designated London Panoramas at View 1 (Alexandra Palace), 2 (Parliament Hill), 4 (Primrose Hill), 5 (Greenwich Park) and 6 (Blackheath Point) are all assessed in the submission, as the proposal would be visible to varying degrees. The magnitude of change in these broad panoramas is considered minor. The proposal would be a comparatively modest consolidation of the overall existing form of the Cluster. In particular, it would be seen partially foregrounding or occluded by 20 Fenchurch Street, depending on the viewing position; it would appear as a comparatively (in relation to the Cluster as a whole) modest, yet elegant, western bookend to the Cluster. Through its role in consolidating the western edge of the Cluster, the proposal is considered to constitute a minor enhancement to the characteristics and composition of these views.
- 253. As such, the proposal would accord with the visual management guidance in relation to these views, consolidating the City Cluster which is identified as a landmark in these views and preserving their composition and the viewers' ability to recognise and appreciate the Strategically Important Landmarks, including St Paul's Cathedral.
- 254. From the designated Townscape View LVMF 26A (St James Park) the proposal would be invisible and therefore have no impact.

*River prospects*

- 255. The magnitude of change and potential impact to River Prospect views is greater, given the building would be located on the south-western edge of the City Cluster, in close proximity to the river Thames. River prospect views 10A.1

and 25A.1 have been assessed above, the remaining relevant views are identified and assessed below.

*LVMF View 11 B.1 and 11B.2 London Bridge downstream – HTVIA View 20*

256. The focus of the view is Tower Bridge and the Tower of London, in addition to the river, which dominates the foreground and middle ground of the view (p.108 of the SPG). The guidance also identifies Adelaide House, the former Billingsgate fish market and the Custom House, within this view as adding formality to the foreground of this view.
257. The proposed tall building would just be seen from position 11B.2 to the west, and left of the viewing frame, at great distance and visual separation from the WHS and Tower Bridge. From this viewing position, there would be no impact on the ability to recognise and appreciate Tower Bridge and the Tower of London, due to the minor degree of intervisibility.
258. 119. Overall, proposal would preserve the townscape setting of the Tower of London and Tower Bridge, whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance.

*LVMF View 15 (15B.1 and 15B.2), River Prospect, Waterloo Bridge (downstream)*

259. This is an iconic London view. St Paul's Cathedral is identified as the Strategically Important Landmark. It is considered that the proposal would complement the development of the emerging City Cluster as a coherent entity in the skyline composition, assisting in subduing and taking the tension out of the isolated 'eye-catching' visual influence of 20 Fenchurch Street. The height is appropriate to the site and would create a gentle undulation in the roofline of the Cluster, stepping down from the apex around 22 Bishopsgate, towards the scale of the River and would be of a high-quality design. This is in accordance with paragraph 263 of the SPG visual management guidance.
260. The proposal's west elevation would be prominent in these views and the striking diagonal run of terraces would add dynamism and variation to the existing elevations of the Cluster. The south elevation would be more obliquely visible, with the glazed south-west corner 'held' intriguingly by the subtly rippling light and shade of the innovative 'fin' façade system, the appearance of which is to be secured via condition and S.106 agreement to ensure it delivers on its promise of visual dynamism in varying weather conditions and at night.
261. The proposal would not draw tall buildings closer to St Paul's, would not affect its clear sky backdrop and would not dominate or cause a 'canyon effect'

around the Cathedral, in accordance with guidance in paragraphs 264-267 of the SPG. It would not obscure or detract from any identified landmark element in the view and would give further context to those relevant Cluster landmarks identified.

262. The proposal would preserve the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 262-264, 265 and 57 of the SPG.

*LVMF View 16 (16B.1 and 16B.2), River Prospect, The South Bank: Gabriel's Wharf Viewing Platform*

263. St Paul's Cathedral is identified as the Strategically Important Landmark. The proposal would complement and contribute to the development of the existing and emerging Cluster of tall buildings, drawing in 20 Fenchurch Street to the far east and south of this view into the cluster.

264. Despite its prominent location on the southern western periphery of the cluster, the proposed tower's location, height and massing, is considered to embed successfully within the composition of the Cluster, and preserve and enhance the townscape setting of St Paul's whilst not detracting from wider landmarks in the view in accordance with the visual management guidance at paragraphs 280-283 of the LVMF SPG.

265. The proposal would preserve the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 280-281,283 and 57 of the SPG.

*LVMF View 17 (17B.1 and 17B.2), River Prospect, Golden Jubilee / Hungerford Footbridges (Downstream)*

266. St Paul's Cathedral is identified as the Strategically Important Landmark. The proposal's appearance in these views would be similar to the visibility from Waterloo Bridge described above. Here again the proposal would consolidate the form of the Cluster, stepping down in height from the apex of the Cluster toward the River. Accordingly it would preserve a recognition and appreciation of St Paul's, strengthening the composition and coherent urban form of an existing tall building cluster and would not obscure or detract from a landmark feature, according with the visual management guidance in paragraphs 301-305 of the LVMF SPG.

*Summary of LVMF Impacts*

267. The proposal would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks (St Pauls and ToL), in accordance London Plan Policy HC4, Local Plan Policy CS13(1), emerging City Plan Policy 2040 S13, and guidance contained in the LVMF SPG.
268. The proposal would preserve St Paul's Cathedral and the Tower of London as the Strategically Important Landmarks and the composition and characteristics of all LVMF views.
269. There would be some minor enhancement to the London Panoramas through the proposal's consolidation of the western edge of the City Cluster. Lighting will be detailed by condition and managed to ensure the development would not command the focus within these views or distract unduly from other elements of their composition, but be visually compatible with them after dark.

### **City of London Strategic Views**

270. The City of London Protected Views SPD identifies views of St. Paul's Cathedral, the Monument, the Tower of London World Heritage Site and other historic landmarks and skyline features, which must be assessed in relation to proposals for new built development. The proposed development site is located within the eastern periphery of the City of London, and as such falls outside of the St Pauls Heights policy area.
271. Kinetic views from the Southbank and the river bridges are identified in the SPD. The heritage significance of relevant historic City landmarks is considered below within the section on indirect impacts to heritage assets.

### **Monument**

#### *Monument Views*

272. In support of 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 have been designed, in terms of siting, height and appearance, to preserve views of and from the Monument.

#### *Views from the Monument*

273. The proposal is not sited in the Monument Views Policy Area and is outside the field of view of identified Views 1-5 from the Viewing Gallery, which would be preserved.
274. Paragraph 4.14 of the Protected Views SPD addresses 'Northern Views' from the Viewing Gallery and states that proposed increases in height near the Monument will be assessed in terms of their impact on views to and from the Monument. The principal axial views are identified as being provided by King William Street and Gracechurch Street/Bishopsgate as leading the eye into the Bank Conservation Area and the fringe of the City Cluster.
275. The proposed tower, due to its proximity to the viewing gallery of Monument, its scale and western building line would introduce a considerable building mass in views of the Monument to the north. In such views (View 31), some of the existing tall buildings in the north of the eastern Cluster would be screened. However, most of the sweep of Gracechurch Street, as referenced in the Protected views SPD, as a principal and historic street within the City would remain legible. The proposal would introduce another tall building, which would read as part of the developing cluster of tall buildings in the City, in both baseline and cumulative views. Whilst the proposal would be prominent, it would be consistent with existing modern development visible from the Monument and would still allow for an appreciation of the diversity of those routes identified and the contrast between the Bank Conservation Area and the Cluster. It is considered that the proposal would not harm the view.
276. No other identified view from the Monument would be affected.

#### *Views of and Approaches to the Monument*

277. The proposal would not be in the 'Immediate Setting' of the Monument as defined in the Protected Views SPD, but it would be in its near setting. It would be prominent in views from Tower Bridge (paragraph 4.22 of the SPD); the Queen's Walk (western end) (paragraph 4.26), and, the approach from Gracechurch Street (paragraphs 4.24 - 4.25).
278. From Tower Bridge the proposal would not obscure or dominate the Monument and would read as part of the Cluster, adjacent to 20 Fenchurch Street. As part of this dynamic, diverse viewing experience, the proposal would cause no harm.
279. Those views from the Queen's Walk (western end) of the Monument, are identified as the most complete and intimate view, of the Monument from the South Bank (4.26). The view from directly opposite on the South Bank is approximately on the line of the Old London Bridge and remains one of the

oldest and best views of the Monument. At present, the Monument is backdropped by the emerging Cluster with some limited sky-etched silhouette afforded to the crowning flaming urn finial. This would remain unaffected in a kinetic experience from this viewing place and at no point would the proposal have a direct interface in the backdrop of the Monument. The siting, height and form of the proposal would allow it to read as part of the emerging coherent Cluster form, while the clean and simple design would not detract from or visually overwhelm the Monument. It is considered that the proposal would accord with the guidance in the Protected Views SPD.

280. In the kinetic experience described in paragraphs 4.24 and 4.25, of the approach to the Monument from the Gracechurch Street/Lombard Street junction, the proposal would be prominent in the view for part of it (Views 1a, b, and c). From this junction, the proposed materiality of the podium is designed to harmonise with the materiality, height and scale of the existing street blocks, creating enclosure to and definition along Gracechurch Street. The tower rises up from the podium, above the recessed double-height transitional floors which mark the top of the podium element and provide some visual relief and separation from the podium and surrounding townscape - due to their setback, glazing ratio, and lighter contrasting materials. This composition would allow the Monument to remain visible, at eye-level, including its golden orb dynamically framed by the proposal in views further north up Gracechurch Street. With the proposals receding into the background of views to the Monument when moving southward along Gracechurch Street. Once at the 'slot view' identified at paragraph 4.25, opposite 52-54 Gracechurch Street, the proposal would be peripheral, the focus remaining principally on the Monument.
281. Views from the Queen's Walk northwards towards the Monument, are identified as the most complete and intimate view, of the Monument from the South Bank (4.26). The view from directly opposite on the South Bank is approximately on the line of the Old London Bridge and remains one of the oldest and best views of the Monument. At present the Monument is backdropped by the emerging Cluster with some limited sky-etched silhouette afforded to the crowning flaming urn finial. This would remain unaffected in a kinetic experience from this viewing place and at no point would the proposal have a direct interface in the backdrop of the Monument. The siting, height and form of the proposal would allow it to read as part of the emerging Cluster form, with enough breathing space to the east of the Monument, such that it would not detract from or visually overwhelm the Monument. It is considered that the proposal would accord with the guidance in the Protected Views SPD.
282. Further assessment of the impact of the proposed development on the significance of Monument is found below within the section on indirect impacts to heritage assets.

Conclusion on Monument views

283. The proposal would preserve all views of and from the Monument identified within the Protected Views SPD and would thereby accord with Local Plan policy CS13 and emerging City Plan S13 and associated guidance in the Protected Views SPD.

St. Paul's Cathedral

St Paul's Viewing Points:

284. The proposal would not be visible and would be out of scope of many of the Viewing Points of St Paul's identified in the Protected Views SPD. Owing to its scale and close proximity to the river, it would be visible along the full kinetic riparian sequences from Waterloo Bridge through to London Bridge.
285. The proposal would be visible from viewpoints to the south, including from the Thames Bridges, Tower Bridge to London Bridge and along the South Bank, Queens Walk. In such views, the proposal would be visible, next to 20 Fenchurch Street, as part of the developing Cluster of tall buildings in the City. In all instances when viewed from the Thames banks or bridges, the proposal would not encroach towards the Cathedral or challenge its primacy and skyline presence. The proposed development would not interact or compete with the silhouette of the Cathedral.
286. The proposal would not be visible from the Processional Approach to St Paul's Cathedral on Fleet Street or Ludgate Hill (Views 21 and 22). The envelope of the building has been designed to avoid any erosion of sky silhouette and space around the Cathedral, thus ensuring pre-eminence in this viewing experience of state and royal significance. The proposal would leave this kinetic townscape experience unaffected, in accordance with Local Plan Policy CS 13 and emerging City Plan Policy S13 and guidance contained in the Protected Views SPD.
287. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral. In these views, the tower would adjoin 20 Fenchurch Street, consolidating the Cluster. It would not obscure or detract from a City skyline landmark and would be an attractive addition to the skyline. It is considered, in both the baseline and cumulative scenarios, it would preserve the composition and character of these views.

288. Views from other publicly accessible elevated viewing area, in particular the “The ‘Sky Garden’ at 20 and 22 Bishopsgate, New Change, Tate Gallery, 120 Fenchurch Street Tate Modern:
289. The Sky Garden is a popular public viewing gallery and visitor attraction offering 360-degree views of London. This public benefit was integral to the planning balance in the Secretary of State’s decision on the 20 Fenchurch Street planning application. The impact on it as a public attraction and sensitive receptor is a material consideration. The viewing experience offers a unique, 360-degree experience over different levels along a perimeter walk. Due to the siting and height of the proposal closely to the west, it would have an impact on the views along the western edge of the garden. At the third landing, views to St Pauls be completely occluded by its massing, other London landmarks, and expansive long range views across the capital would be occluded, thereby partly diminishing the westerly views from the Sky Garden. This diminishment would be entirely mitigated by the provision of the level 35 terrace in the proposal, which would be a significant new elevated public space for the Cluster that would re-provide the views lost from the Sky Garden.
290. From the viewing gallery at the Blavatnik Building within the Tate Modern the proposals will appear within the City Cluster, situated to the left of 20 Fenchurch Street. The proposal would not affect an appreciation of other key aspects of the skyline from here, including St Paul’s. The visual amenity of the viewing gallery is therefore considered to be preserved.

*Other Borough Strategic Views:*

*London Borough of Tower Hamlets:*

291. Adopted Tower Hamlets Plan 2031 Policy D.DH4 (c) and Figure 6 identifies designated local views of which model View D (THVIA October 2024) from the Wapping Wall bridge at the entrance to the Shadwell Basin is relevant. The Shadwell Basin provides a clear space over which the historic church spires of St Paul’s Shadwell and St George in the East can be viewed. The City Cluster is visible to the west and left-hand side of the view detached from the local context. In baseline and cumulative scenarios only slivers of the proposed development would be visible to the beyond the north of 20 Fenchurch Street at considerable distance to the south west of the churches identified in this view. Overall the proposals would mark a virtually imperceptible change in the composition of the view and preserve the prominence of local designated landmarks and designated view 2, in accordance with LBTH Policy D.DH4.
292. The proposal’s appearance in views from other neighbouring boroughs has been considered. In many instances the proposal’s appearance would be very



similar to the strategic views assessed above, and the impact would not change.

### **City Landmarks and Skyline Features**

293. The proposal would not affect views of the majority of City landmarks and skyline features in accordance with CS 13 (2). Those potentially affected by the proposals, are identified and assessed below:
294. The impact on St Pauls Cathedral and its setting is also discussed in the St Paul's approaches and in detail in the LVMF sections above.
295. St Paul's Cathedral has metropolitan presence in London along the 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. The unblemished visibility of the Cathedral along the Processional Route of Fleet Street and Ludgate Hill is of metropolitan historic and ceremonial interest. (HTVIA Views 21 and 22)
296. In wider pan London views and approaches, 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.
297. In baseline and cumulative scenarios, officers consider that while visible, the siting of the proposals to the west of 20 Fenchurch Street and in the context of the developing Eastern Cluster, and taking into consideration the scale, design, materiality, and colouration, the proposal would not diminish an appreciation of St Paul's Cathedral as a skyline landmark and there would be no encroachment on or erosion of the ability to appreciate its defining silhouette. Thus, the skyline presence of this City Cathedral is considered preserved.

### **St Dunstan-in-the-East, St Dunstan's Hill (Grade I)**

298. The proposals would be seen as part of the wider backdrop behind St Dunstan in the East, in views from the south-east (HTVIA View 10). In such views the development would join an existing and established backdrop of tall buildings, including 20 Fenchurch Street, which characterise long and mid-range views of the church from the south and south-east. The proposal, taking into consideration its scale and design would not detract from the presence or contribution of the Church within such views, allowing the steeple to remain

legible and distinct. Thus, the skyline presence of this City Landmark is considered preserved.

*St Magnus the Martyr, Lower Thames Street (Grade I)*

299. The impact of the proposal on this church is assessed in detail in the Heritage section below.
300. The proposal would be visible in some views of the church from the south, including views from the western end of the Queen's Walk (HTVIA View 37). In such views, the proposal would read as part of the Cluster, whilst providing significant breathing space between it and the Church, which would remain prominent and with a skyline presence related to the Monument.
301. When visible in approaches of the church from the north, including from Gracechurch Street (HTVIA View 1c), again the proposal would be seen in the context of other towers on the eastern side of Gracechurch Street and would not obscure or detract from the Church. Thus, the skyline presence of this City Landmark is considered preserved.

*St Margaret Pattens, Eastcheap (Grade I)*

302. The proposal would be seen in the backdrop of views of this City church in views from the south-east (HTVIA View 10). In such views the development would join an existing and established backdrop of tall buildings, including 20 Gracechurch Street, which characterise long and mid-range views of the church from the south and south-east. The proposal, taking into consideration its scale, design, materiality, and colouration would not detract from the presence or contribution of the spire of this church within such views, allowing it to remain legible and distinct. Thus, the skyline presence of this City Landmark is considered preserved.

*Cannon Street Towers (Grade II):*

303. The proposals would be seen as part of the wider backdrop behind the Station Towers in views from the South Bank. In such views, the development would form a group with the existing tall building at 20 Fenchurch Street. The proposal, taking into consideration its scale, design, materiality, and colouration, would not detract from the presence or contribution of the Station Towers within such views, allowing the Station Towers to remain distinct.
304. In some of these views, including in views from Southwark Bridge (HTVIA View 38), the proposal would appear directly behind the western tower. Due to the existing background of tall buildings in such views, including 20 Fenchurch

Street and 52 Lime Street, as well as the contrasting materiality and colour palette to the historic brick and lead of the Station Towers, their prominence and distinctiveness would be retained.

305. Therefore, the skyline presence of this City Landmark is considered preserved.

*Conclusion on City Landmarks and Skyline Features:*

306. The proposal would preserve views of all relevant City and Non-City Landmarks and Skyline Features and comply with of CS 13 (2) and emerging City Plan 2040 S13 and associated guidance in the Protected Views SPD and LVMF SPG.

*Conclusion on Strategic Views*

307. The proposal has been sited alongside an established nucleus of tall buildings of the western periphery of the City Cluster, seeking to consolidate strategic growth in areas with the least impact on pan-London and strategic views. In doing so, the proposal would preserve strategic views of and from the Tower of London World Heritage Site and the Monument, and of St Paul's Cathedral and its setting and backdrop.
308. In its western peripheral role in consolidating the Cluster, the proposal would be a minor enhancement of the composition and characteristics of LVMF London Panoramas.
309. The proposal would preserve the characteristics and compositions of all relevant LVMF and other strategic pan-London views.
310. It would preserve strategic views of and from the Monument and of the setting and backdrop to St Paul's Cathedral would preserve neighbouring borough views and would preserve views of relevant City Landmarks and Skyline Features.
311. Following rigorous assessment, the proposal would preserve all relevant strategic views in accordance with Local Plan policy CS13, emerging City Plan Policy S13, London Plan Policy HC4, GLA LVMF SPG, City of London Protected Views SPD and neighbouring local view policies and guidance.

**Heritage**

312. Objections to and comments on the impact of the scheme on settings of heritage assets have been received from Historic England, as well as other third parties. Officers have considered these representations carefully and afforded

them considerable importance and weight. Where officers disagree with views expressed by statutory consultees, clear reasoning has been provided in this report.

### **Designated Heritage Assets**

313. The building is not listed or located within a Conservation Area. The proposals would therefore not result in a direct impact on any heritage asset.

### **Indirect Impacts**

#### **2-3 Philpot Lane (grade II)**

##### *Significance*

314. 2-3 Philpot Lane is a good example of post-Fire 18th century City ensemble, of a residential townhouse located off-street in an intimate courtyard behind attractive iron gates, which is and would have been fronted by commercial development. A late 17th century, post-fire house was likely re-developed in the 1720s and split into two, altered and split again for multiple occupation in the 19th century while the rear developed as a warehouse and associated office chambers. It was originally thought to be three storeys with an additional two added, the most recent a 2003/4 mansard. Bomb damage maps suggest substantial damage and assumed subsequent restoration. In 2014, a major refurb and associated conversion to serviced apartments was completed. The building is now 5 storeys with the current main entrance a narrow (3 bays) front on an attractive courtyard off Philpot Lane, stuccoed with parapet and sash windows and a good door architrave with carved consul brackets, whilst the western elevation is similar but plainer and more altered. The much more hidden northern elevation is of more interest, of red brick with moulded dressings and likely the earliest survivor of what remains, which, on the whole, is, modern fabric. That said some historic interior survives.
315. The asset is of high architectural and historic interest, and to a lesser extent artistic or archaeological, largely due to the off-street courtyard typology evident on the more authentic Philpot Lane side. The building's earlier, non-stuccoed fabric on the northern elevation adds to its historical integrity, while the more extensively altered western and southern elevations still contribute to the overall character.

##### *Setting*

316. The main contribution to setting derives from the close appreciation of the building within its courtyard off Philpot Lane, the non-public northern alley

accessed from Philpot Lane, and the northern courtyard. To a lesser extent, Brabant Court also adds to this setting, with group value alongside 4 Brabant Court and 7-8 Philpot Lane.

317. The wider setting of the asset has changed considerably over the years and now also includes large-scale modern buildings, particularly to the west (along Gracechurch Street) and to the east (No. 20 Fenchurch Street). These modern elements do not make any contribution to the significance of the asset.
318. The east elevation of the existing building on the application site faces onto the courtyard west of 2-3 Philpot Lane and east of the application site (“northern courtyard”) and makes a neutral contribution to the significance of this listed building.

#### *Impact*

319. The setting of 2-3 is characterised by intimate scale courtyards and alleys, affording mainly enclosed views of the immediate surroundings. From the main entrance courtyard (east of the asset) and northern alley, from Philpot Lane, the sense of enclosure means the proposal would have no impact. The proposal would be seen behind a tiny corner of the listed building which juts into Brabant Court, but this appears disassociated from the majority of the listed building which is otherwise concealed from Brabant Court by other buildings. From the northern courtyard, the podium would be visible and form the western elevation of the courtyard, responding to the scale and proportions of 2-3 and reinforcing the sense of enclosure created by the courtyard. Its solid design and materiality is considered appropriate for this historic setting. The tower element would also be visible from the northern courtyard and west views from the asset. Seen from Fenchurch Street, the proposal would be partially concealed behind No. 10 Fenchurch Street and would be perceived as part of the dynamic, wider context of the listed building. Due to its set back location and clearly different materiality, it would be perceived as a tall building in the background of such views, consistent with the perception of existing background tall buildings, most notably 20 Fenchurch Street. The elements of setting that contribute to the significance of the listed building would not be negatively affected by the proposed development.
320. Therefore, in both the baseline and cumulative scenarios, the proposal would preserve the setting and significance of the listed building, and the ability to appreciate it.

#### 7-8 Philpot Lane (Grade II\*)

#### *Significance*

321. Much altered terrace, dating from the late 17th century, substantially redeveloped in c.1984 and again refurbished in 2018 leaving little authentic fabric. Italianate style, stucco-fronted brick terraces, with clay tile clad hipped roofs. The principal significance lies in the basement interior, a rare and unique late Medieval vaulted undercroft. It is of high architectural, historic, and archaeological significance.

### *Setting*

322. It draws a moderate degree of significance from setting, in particular, as a group around Brabant Court and in association with 4 Brabant Court, 2-3 and 5 Philpot Lane. Together these form a rare and unique ensemble of the form and urban grain of the pre-industrialised, pre and immediately post-Fire City of London – comprising smart brick-faced terraced commercial fronts and quieter, intimate off-street domestic/cottage industry courtyards.

### *Impact*

323. The proposal would be seen and appreciated in the context of the emerging Cluster in the immediate and wider setting from Philpot Lane and Brabant Court and located opposite 20 Fenchurch Street. These dramatic contrasts in scale between the old and new are an established character trait of this setting. In closer views from Philpot Lane, the listed building would continue to hold and dominate the field of view, with the proposal reading as part of the dynamic background setting. It is considered, in both the baseline and the cumulative scenarios, the proposal would preserve the special interest/significance, and the contribution made by setting to the significance of 7-8 Philpot Lane.

### 4 Brabant Court (grade II)

### *Significance*

324. The listed building at 4 Brabant Court is an early Georgian house, four storeys high (above basement), four bays wide, of the early 18th Century. It is faced in good red brick (evidence of tuck pointing) with details characteristic of a now rare and intact example of a post-Fire, pre-Building Acts and pre-Palladian-influenced London terrace house. This is evident in the regular, albeit not symmetrical, fenestration with flush-faced, moulded and segmental-headed sash windows and a well detailed entrance with Doric architrave and segmental pediment abutting the pavement, rather than the later arrangement of setting behind a basement area. Its roof and chimneys are understood to survive as is an original stair and panelling inside, alongside a (tanked-out) vaulted basement. It is a now rare example of the historic tradition in the City for higher status merchant houses to be built off-street, on quiet, enclosed domestic

courtyards, later to be accompanied by small-scale commerce/industry. By reason of its age, rarity, apparent authenticity and architectural expression, it is of high architectural and historic significance, and to a lesser extent of some artistic and archaeological.

### *Setting*

325. Whilst the physical historic fabric makes the substantive contribution to significance, it also derives a moderate degree of significance from setting. The setting of the house changed substantially throughout the 19th, 20th and 21st centuries. This is both in the immediate setting, including the substantive alteration to 2-3 and 5 Philpot Lane, and in the wider setting, now comprising the emerging City Cluster and 20 Fenchurch Street, accentuating a drama of contrast in scale. The most significant change resulted from the previous re-development of 55 Gracechurch Street, which truncated the historic form of Brabant Court, which once extended beyond the current layout, as part of an intricate web of domestic scale courts and alleys once connecting Gracechurch Street and Philpot Lane. The immediate, well-enclosed and intimate setting of Brabant Court, complete with historic vaulted coach entrance, cobbled carriageway, granite kerbs, flagged edges and retained wrought iron gates, in an apparent original form, when appreciated with 7-8 Philpot Lane and to a lesser extent 2-3, create an authentic ensemble collectively forming the element of setting which contributes to that principal architectural and historic significance.

### *Impact*

326. The proposed development would be visible from Brabant Court, but only facing northwest, away from the listed building; at most it would be peripheral to the field of view, with the listed building and the intimate, small-scale character of the historic court remaining pre-eminent. At most the proposal would be seen as a background element of the modern City beyond. Consequently, the human scale that defines 4 Brabant Court would remain intact, as it would still be visible and experienced within its historic, small-scale surroundings. In both the baseline and cumulative scenarios, the proposal would preserve the setting and significance of the listed building, allowing for continued appreciation of its historical context.

### *Iron Gates in St Benet's Place (grade II)*

327. The wrought iron gates on St Benet's Place are grade II listed. Considered 18th Century, the gates are not considered to be in their original location and were re-instated here following redevelopment of the site in 1993. Of black-painted wrought iron, they comprise an attractive composition of double-leaf gates

flanked by decorative side panels and crowned by a tripartite overthrow with central axis lantern (altered) and fine filigree. A small additional panel has been added on the north side, upsetting an otherwise symmetrical composition. The gates are of architectural, historic and artistic significance.

328. Setting makes a limited contribution to significance, given the original purpose/setting is unknown – though their intimate setting on an enclosed alley gives a sense of a historic setting, making a modest contribution to significance and an appreciation of it.

#### *Impact*

329. The proposals would introduce a change within the listed gates' wider surroundings, however, those aspects of setting which have been found to contribute to significance would remain unchanged. Therefore, there would be no impact upon the setting or significance of the listed building or the ability to appreciate it.

#### *The Monument (Grade I and Scheduled Ancient Monument):*

330. The Monument to the Great Fire ("the Monument"), by seminal architect Sir Christopher Wren and Robert Hooke, built 1671-77, symbolised the restoration and renaissance of London following the Great Fire of 1666 as a major European economic, cultural and political centre. It comprises an elegant fluted Roman Doric column of Portland Stone with a crowning gilded flaming urn sat atop a large pedestal containing inscriptions and base relief representative of the sociopolitical context in which it was built. The monument is also an early example of a purpose built public viewing gallery and visitor attraction, the scale and design of which was intended to be dominant over its surroundings and command a London-wide presence.
331. It is of exceptional architectural, artistic, historic and archaeological significance as a City/London-wide landmark, and also holds notable group value with other Wren designs across the City Setting
332. The setting of the Monument makes a significant contribution to its significance and an appreciation of it, in particular its architectural, historic and to a lesser extent artistic significance. It was symbolically sited near the site on Pudding Lane where the Fire began and on near axial alignment with the Old London Bridge, the site of the original Roman bridge from which London originated. It once, alongside the rebuilt City church towers/spires, was pre-eminent in the much artistically represented London skyline as part of a family of Wren landmarks representing the character and identity of the City of London up until the end of the 19th Century. It comprised part of the main southern arrival



experience from London Bridge of the gravitas and grandeur of a Renaissance city. As it did then, it has informed the height and curation of the townscape around it for over 300 years.

### *Impact*

333. There is currently some intervisibility between the Monument and the site, mainly in views south from Gracechurch Street, however, the existing building on the site does not make any contribution to the significance of the Monument.
334. The proposal would be prominent in the backdrop and setting of the Monument on a number of long and mid-range views, including on approach from London Bridge (Views 20, F and G), on axis from the South Bank (Queen's Walk, western end, View 37), on approach from Lower Thames Street/Outside St. Magnus the Martyr (View 34a), Lower Thames Street/ Fish Street Hill (View 34b), and from Gracechurch Street (Views 1a, b and c). From London Bridge, the gilt orb is visible above Adelaide House, albeit not prominent, even incidental, and is seen in front of 22 Bishopsgate and 1 Leadenhall (currently under construction). The proposal would appear in front of the existing towers, at the backdrop of the gilt orb and would not diminish it any further. The impact from Queen's Walk is addressed in paragraph 156, the proposed would appear in front of existing tall buildings in the established Cluster. Currently, the Monument is set against the emerging Cluster, with the crowning flaming urn finial silhouetted against a limited portion of the sky. This silhouette would remain undisturbed, and the proposal would not intersect directly with the Monument's backdrop. Its placement, height, and design would integrate with the developing Cluster, and its clean, simple appearance would neither detract from nor visually overpower the Monument.
335. The approach from Bishopsgate/Gracechurch Street is in part covered in paragraph 157. In the kinetic experience, approaching the Monument from the Gracechurch Street and Lombard Street junction, the proposed structure would be prominent however it would still allow the Monument to be preeminent at eye-level and gradually come into view as one moves along Gracechurch Street, while the tower subtly recedes into the background.
336. Historic England have raised concerns that the proposal would encroach upon the Monument, including views from outside the Church of Saint Magnus the Martyr, looking north up Fish Street Hill (Views 34 a and b). They mention that "the proposals would appear directly behind the column of the Monument up to the height of the capital and viewing gallery. This effect would diminish in a kinetic experience moving north along Fish Hill Street, but one would still be left with an impression of the Monument being dwarfed by its context, which runs counter to its intended purpose".

337. Officers consider that the proposal, at the acutest point in these viewing experiences, would erode the silhouette and prominence of the Monument on this important historic approach, and thereby challenge its conception and significance as a public viewing gallery and monument to the Great Fire with a commanding presence across London. The impact would be slightly exacerbated by the proposed reflective 'fin' façade system for the south elevation, which would, in these views, add complexity to the backdrop to the Monument's silhouette. Officers however note that the Monument would quickly regain its primacy and legibility as the observer ascends Fish Street Hill (west side), when the proposal would begin to recede from behind its silhouette.
338. The proposal has been amended over the course of the pre-app to soften the impact of the scheme on the Monument, namely by refining and adjusting the form of the crown to make it more subservient, and glazing the western third of the south elevation, which would soften this part of the elevation read behind the Monument. Nevertheless, there would still be a harmful impact arising chiefly from the siting and overall height of the proposal, although it would quickly recede to become more subservient as the viewer's position changes.
339. In the cumulative scenario, additional towers would be visible in relation to the proposed development. In views from the south, including from outside the Church of Saint Magnus the Martyr, the tall buildings at 70 and 85 Gracechurch Street would also be visible, but only partially, mostly hidden behind the proposed development at 60 and at a much lower apparent height. As such, the impact of the proposed development would remain the same.
340. While the design has evolved to minimise the harmful impact arising from the proposal, in both the baseline and cumulative scenarios, the proposed development would result in low level of less than substantial harm to the significance of the Monument.

#### *Tower Bridge (grade I)*

##### *Significance and setting*

341. Tower Bridge, completed in 1894, was designed by famous engineer Sir John Wolfe Barry and architect Sir Horace Jones for the City of London Corporation. It represents a triumph of Victorian engineering as a low hybrid suspension and bascule bridge with a steel frame - the fantastical revivalist French medieval gothic exterior of towers, turrets and pinnacles comprising a High Victorian monument in the romantic medieval tradition, disguising the more modern structural innovation beneath. The dramatic symmetrical composition acts as a 'portal' to central London from its River. It has become an iconic and internationally recognised landmark of London.

342. The building possesses very high architectural/artistic interest for its iconic silhouette, refined Victorian revivalist gothic stylings, and marriage of modern functionality with High Victorian aesthetics. It possesses very high historic significance for its associations with the aforementioned architectures, of national repute, and for its iconic, worldwide fame as a symbol of London. The dramatic setting of the building astride the Thames, its approaches to the north and south, and its juxtaposition with the Tower of London nearby make a significant contribution to significance, in particular an appreciation of it.

### *Impact*

343. The proposal would largely leave the visual experience of Tower Bridge unaffected, including from the west, north and south-west.
344. However, the visual experience of the Tower Bridge, in kinetic views from Butler's Wharf (View 9), on the south side of the River, would be affected. From these views, 20 Fenchurch Street is prominent in views of the bridge. Presently, the Cluster is emerging to the north-west beyond it. From this point, the proposal appears alongside 20 Fenchurch Street, partially visible to the south, at a lower height, on the western periphery of a Cluster.
345. Historic England commented that "the current proposals would add considerable additional built form to this framed view and further reduce the amount of clear sky within the space between the two towers and upper and lower decks of the bridge that allows the unique form of the bridge to be appreciated and understood. The proposals would therefore add some harm to the considerable harm already caused by the presence of No. 20 Fenchurch Street to the significance of Tower Bridge through development within its setting".
346. Officers agree that the further erosion of sky in the open 'picture frame' between the iconic towers would further undermine the composition of the bridge and its role as the 'gateway' to central London, drawing the Cluster further west. The impact would lessen on approach to the bridge, which becomes more prominent as the observer moves closer, until it commands and dominates the foreground. Given the limited extent of the impact, its transiency, the significant distance of the proposal to the west and the relative significance of the particular viewing platform, it is considered that the harm would be less than substantial, very much at the lower end of the spectrum. At this distance, the innovative 'fin' façade system would have a more subtle, shimmering presence and would not exacerbate the harm.
347. In the cumulative scenario, additional tall buildings would be visible in views of the bridge from the east, including 70, 50 and 85 Fenchurch Street, to the north-

east from the development site. These additional schemes would appear as part of the developing Cluster of tall buildings in the City, which already define the backdrop of this view, with various individual impacts on the Tower Bridge. In both baseline and cumulative scenarios, there would be some harm to the significance of the Tower Bridge due to changes to its setting and this harm is considered to be at a low level of less than substantial, at the lower end of the spectrum.

### Church of St Mary Woolnoth (grade I)

#### *Significance and contribution of setting:*

348. The distinctive English Baroque Church of St Mary Woolnoth, built 1716-1727 by Nicholas Hawksmoor, is the parish church of the Lord Mayor of London. The Portland stone principal west front comprises an original composition of double height rustication with Tuscan columns and a tower of twin turrets, crowned by coupled lanterns. It is of very high architectural, historic, artistic and archaeological significance. The unique work of English Baroque architecture is an arresting landmark at the centre of the City of London.
349. Its prominent siting at the junction between King William Street and Lombard Street from the heart of the City at Bank Junction, is set amongst a panorama of fine classical commercial, civic and in this case, religious, monuments from all eras. This makes a medium contribution to the significance of the Church.

#### *Impact*

350. The proposal would appear in the backdrop of the Church in views from the west (Views 5 and 6), in particular in views along Lombard Street. The foreground of Portland Stone classical buildings are presently backdropped by Cluster of tall buildings behind, creating a theatrical contrast in scale and character between the old and new City.
351. Historic England have raised concerns about the impact of the proposal on St Mary Woolnoth. "The proposed development would appear taller than 20 Fenchurch Street, and would be closer to the viewpoints around the junction, increasing its dominance and distracting effect on the listed buildings in the foreground. The detailed design of the proposals, with visually striking ladder of the terraces all the way up the building on its eastern elevation, would compound this impact. Existing Cluster buildings are typically plainer in character with unmodulated glass-curtain walls that are less of a visual distraction..... The proposals would introduce a new harmful impact to the skyline in reducing the clear sky backdrop to the church's distinctive tower. This

*would detract from the ability to appreciate its architectural qualities and as a landmark building.”*

352. The proposal would appear in the backdrop of the Church in views from the west. The scope of these views is visually rich, with the church seen amongst the fine masonry buildings of the historic Bank Conservation Area, backdropped by hypermodern glazed forms of the Cluster which creates a theatrical contrast in scale between the old and the new City.
353. This is a kinetic and transitory viewing experience in which the Church is predominantly experienced as embedded in the historic City, distinct and disassociated from the modern Cluster behind. From various points around Bank Junction the proposal would be seen behind or adjacent to the church, falling out of prominence in the view as the viewer moves closer to locations such as the meeting of Lombard Street and King William Street where the Church would clearly be the dominant presence in the field of view, with the proposal receding out of view behind.
354. Officers consider that while there might be moments of visual proximity between the proposal and the Church, the physical distance between them and the established background setting of glazed Cluster forms seen at a remove from Bank Junction means that there would be clear conceptual separation between the proposal and the Church, and that the Church would continue to read as pre-eminent in the viewing experience. In this context, officers consider that the dynamic design of the building, and in particular the ladder of terraces referred to by Historic England, would not form a visual distraction.
355. As such, in both baseline and cumulative scenarios, the proposal would preserve the setting and significance of the church.

*39-40 Lombard Street (grade II):*

356. Built in 1868, by Francis, of Portland Stone in a uniquely sumptuous and rich ornate Italianate palazzo manner, a good and unique example of the then emerging City livery of choice for dependable commerce and potentially a nod to the Lombardy merchants which lend the street its name. Comprising a tall ground floor (potentially a former banking hall) and rich carved classical detail to the upper floors. It is of architectural, artistic and to a slightly lesser extent historical interest.
357. Its immediate setting, defining the corner of Gracechurch Street and Lombard Street, seen alongside other classical Portland Stone commercial edifices, makes a modest contribution to significance overall.

### *Impact*

358. The proposed development would be visible in the context of other tall buildings in the backdrop of this listed building, more notably 20 Fenchurch Street, which commands the backdrop on the approach from the west along Lombard Street (View 7). The proposed development would appear closer and more prominent than 20 Fenchurch Street but would still align with the existing backdrop from this angle. The podium's robust masonry base establishes a harmonious relationship with the masonry buildings in the Bank Conservation Area and respects the scale and proportions of 39-40 Lombard Street.
359. The full significance of the building is better appreciated in close view, in particular where the sumptuous detail can be appreciated, where given the scale of 39-40 and the height-to-width ratio of the street, it would command the foreground, while the proposal would only be visible at a high level in the oblique.
360. While the proposal would introduce a change in the setting of this listed building, it would cause no harm to the significance or setting of 39-40 Lombard Street and the ability to appreciate it.

### 38 Lombard Street

#### *Significance and setting*

361. Dating to the mid or late 19th century, this Portland stone building is designed in a classical style. It stands four stories tall with an added attic and a two-storey mansard roof. The facade features four windows, most with segmental arches. The ground floor is arcaded, adorned with polished pink granite pilasters. It is of architectural, artistic and to a slightly lesser extent historical interest.
362. Its immediate setting is defined by its location at the eastern end of Lombard Street, seen alongside other classical Portland Stone commercial edifices, including nos. 39-40 Lombard Street, makes a modest contribution to significance overall.

#### *Impact*

363. On approach from the west along Lombard Street, the existing backdrop is commanded by the bulk of 20 Fenchurch. The proposed development would appear closer and more prominent than 20 Fenchurch Street but would still align with the existing backdrop from this angle. Located further west into the street, this listed building benefits of more enclosure when approaching it from

the west, affording more limited views of the existing tall buildings in its surroundings.

364. In any case, the full significance of the building is better appreciated in close view, where given the scale of 38, and the height-to-width ratio of the street, it would command the foreground, while the proposal would only be visible at a high level in the oblique. No. 38 would continue to be seen in the context of the neighbouring nos. 39-40 Lombard Street, retaining its relationship with its existing historic context.
365. While the proposal would introduce a change in the setting of this listed building, it would cause no harm to the significance, or setting of 39-40 Lombard Street and the ability to appreciate it.

*Church of St Magnus the Martyr (grade I):*

366. By renowned architect Sir Christopher Wren, of Portland Stone, it replaced an earlier church on the alignment of the Old London Bridge, comprising a landmark arrival monument on approach to London from the south. Re-built post-Fire, 1671-1687, it comprises a galleried rectangular aisled nave and defining west tower, one of Wren's most elegant, which is multi-staged and crowned by a hexagonal arcaded lantern, lead dome and steeple. Its setting, despite the loss of the Old and re-orientation of the new London Bridge, and considerable setting change as London developed (and then declined) as a major international port, still makes a medium contribution to significance as a result of a prominent relationship with the River, in particular on the old alignment of London Bridge from the Queen's Walk, and on approach from Gracechurch Street. The strong architectural and historic relationship with the Monument, also by Wren, adds to that significance.

*Impact*

367. The proposed development would introduce a tall building to the north-east of the Church, just west of 20 Fenchurch Street. When visible, in views of the church from the south, including views from the western end of the Queen's Walk, the proposal would read as part of the Cluster, whilst providing significant breathing space between it and the Church, which would remain prominent and with a skyline presence related to the Monument. On approach from Gracechurch Street, again the proposal would be seen in the context of other towers on the eastern side of Gracechurch Street and would not obscure or detract from the Church. In local views of the Church, the listed building would continue to dominate the foreground. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

*St Dunstan in the East (grade I)*

368. The listed building includes a tower and steeple by Wren, constructed between 1695-1721 and the ruins, following bomb damage, of a later church, built between 1817 to 1821, based on designs by David Lang. In 1967–71, the ruins of the church were transformed into a garden, incorporating the restored Wren tower.
369. The building has high historic and architectural interest as a ruinous early 19th century church, featuring a post-Fire steeple and tower designed by Wren.
370. The surrounding environment of the church has changed over time, with the churchyard now playing a significant role in the appreciation and understanding of the church, making a very positive contribution to its significance. The church's steeple is a material record of work in reconstructing city churches following the Great Fire. Views of the steeple of St Dunstan in the East, including from the riverside, as well as views shared with other Wren churches— St Margaret Pattens, and St Mary-at-Hill, including from the Monument Gallery—also contribute to the church's understanding and significance. Modern development is evident in the wider surroundings of the church, most notably 20 Fenchurch Street. These modern elements of setting do not contribute to significance.

*Impact*

371. The proposed development would introduce a tall building to the north-west of the church, at some distance from it, joining existing backdrop tall buildings, including 20 Fenchurch Street. There would be some intervisibility between the church and the proposal, mainly in some local views of the church, from the south and south-east, as well as some longer views from the riverside.
372. In close, local views, the presence of 20 Fenchurch Street is very prominent, with the proposed development appearing lower and at further distance. Although visible, the proposal would appear clearly in the backdrop, retaining the prominence of the tower and steeple which would continue to be seen and appreciated against clear sky.
373. In terms of longer views, the steeple of the church is visible from a number of south-east views from across the river (View 10). In these views, the steeple is visible against an existing backdrop of modern buildings, including 20 Gracechurch Street and 20 Fenchurch Street. The proposal would appear behind the church, in front of 20 Gracechurch Street. While this would intensify the contemporary background of the steeple, it would align with the established cluster of tall buildings and remain consistent with the current character of these



views. The proposal's clear modernity would create a cleaner backdrop, slightly enhancing the church's legibility and the ability to appreciate it in these views from south-east, however, not in a way that enhances heritage significance. The development would not affect any elements of the setting that contribute to its significance; in the affected views, the steeple would continue to be appreciated alongside St Margaret Pattens and the Monument.

33-35 Eastcheap (grade II\*) & 23-25 Eastcheap (grade II)

*Significance and setting*

374. Two remarkable warehouse buildings on Eastcheap showcasing the opulence and eclectic style of high Victorian architecture. Nos. 23-25, built in 1861-62 by John Young and Son, features a Lombardic Gothic design with polychromatic brickwork, terracotta detailing on round-headed windows, twisted columns, and carved animals adorning the façade. Nos. 33-35, completed in 1868 by R. L. Roumieu, presents a striking composition with emphasised pointed Gothic arches, decorative diapered brickwork, marble accents, and intricate wrought ironwork.
375. The setting of the buildings as part of a range of High Victorian frontages in varied revivalist styles offers a prevalent scale and characterful contrast which make a moderate contribution to significance, which primarily draws from architectural fabric.

*Impact*

376. The proposal would be prominent in the background of the listed buildings, in wider townscape views on approach from the east along Eastcheap, where it would accompany 20 Fenchurch Street as an emerging edge of the Cluster, creating a dramatic contrast in scale, characteristic of this part of the City. The design and materials of the proposed tower would be contemporary and clearly different from the historic buildings. Furthermore, the proposal would be relatively peripheral to or out of the field view in the best views of these buildings: looking north-east from the junction of Philpot Lane/Eastcheap in the case of Nos. 23-25, and at the head of Lovat Lane, and obliquely east and west along Eastcheap in the case of Nos. 33-35.
377. In the cumulative scenario, 70 Gracechurch would also be visible in the backdrop of the listed buildings, at a lower apparent height than 20 Fenchurch Street and the proposal. Similarly, the cumulative schemes would reinforce the existing drama between the historic buildings and the modern tall buildings in the Cluster.

378. In close views, in both the baseline and cumulative scenarios, the listed buildings would continue to dominate the foreground while the proposal would be perceived as consistent with existing modern buildings in the background of the listed buildings. As such it is considered that the proposal would preserve the significance and setting of nos. 23-25 and 33-35 Eastcheap, and the ability to appreciate them.

### Adelaide House

#### *Significance and setting*

379. Adelaide House, built by Sir John Burnet and Tail in 1924-5 is a large, steel framed office building of 11 storeys, faced in Portland Stone and granite, with archaic Greek and Egyptian style decorative motifs. Its significance lies in its high architectural quality, historic interest as an art deco office building and its prominent setting on the north-east side of London Bridge and the River Thames.

#### *Impact*

380. The proposed development would be visible in views of Adelaide House, particularly, in views from the south (View 37). In some views from London Bridge, the proposed development would rise directly behind the listed building (View 20). When visible, the proposed development would appear as part of the emerging Eastern Cluster. Existing buildings within the cluster provide a backdrop to and above the Grade II listed Adelaide House, with 20 Fenchurch Street dominating the foreground views with The Leadenhall Building and 22 Bishopsgate appearing prominently behind. In the cumulative scenario, additional tall buildings, including 1 Undershaft would appear as part of the developing Cluster.
381. The proposed development would be consistent with the character of this view and the backdrop of tall buildings. While in some views it would appear directly behind the listed building, the clearly separate and contemporary materiality and design would allow for the silhouette of the building to be appreciated. As such the listed building would retain its prominence and would not be diminished by the proposed development, including in views from south of the river and along London Bridge.
382. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### Eastcheap Conservation Area

383. The Eastcheap Conservation Area Character Summary and Management Strategy SPD (the SPD) prescribes the overarching significance as an area with strong historical associations with the Thames, with a number of notable post-Fire landmarks and good commercial architecture from all periods occupying an ancient street pattern and urban grain. The SPD acknowledges a shift in scale between the Conservation Area and the adjacent developing Cluster, with taller structures marking its boundaries, including notable modern commercial buildings like 20 Fenchurch Street. Similar to other Conservation Areas in this part of the City, the Eastcheap setting is characterised by a visual relationship with modern tall buildings in the background.

*Impact*

384. The proposed development would be located outside of the Conservation Area, to the north-west. The majority of the views from within the Conservation Area would be unchanged, given siting of the proposal to the west and the particular dimensions and character of a unique historic urban grain. The proposed development would be most visible from Eastcheap, and only glimpsed from areas in the north-west and south-east of the conservation area. In these more glimpsed viewing experiences, such as from St Dunstan in the East churchyard, the proposal would read as part of the City Cluster beyond and have no harmful impact.
385. Seen from Eastcheap, especially the junction with Philpot Lane and at the top of Lovat Lane, the proposal would introduce a dramatic change in scale from the low-rise historic streetscape prevailing in this westerly view. It would appear close behind the group of buildings addressing the north-west side of the junction. In these views the proposed innovative 'fin' façade system would be seen at close quarters, the subtly rippling effects of light and shade thereby created being highly prominent and creating visual complexity close behind the conservation area. For these reasons the proposal would cause a degree of harm to the setting and therefore significance of the conservation area, although overall the degree of harm would be slight, in view of the proposal's impact only on certain and not all views, and the established context of tall buildings which frame the setting of the conservation area.
386. The view of the Conservation Area from the Monument Viewing Gallery is also noted in the SPD. The proposal would rise prominently to the north-west of the Conservation Area (View 31) but would preserve an overall appreciation of the roofscape and distinct of the Conservation Area. In this view, the southern elevation of the tower would be mainly visible, comprising of one glazed and two solid bays, with three glazed pavilions defining the upper storeys of the elevation, providing a lightweight termination for the tower. Greenery in the

balconies of the west elevation would be visible from here, as well as greenery at the top of the building.

387. Overall, the proposal would introduce a significant change to the setting of the conservation area, introducing a very large and visually complex new element behind a characterful group of buildings at the junction between Eastcheap and Philpot Lane. This would cause a degree of harm to the setting of the conservation area, at the slight end of the less than substantial scale.

### Bank Conservation Area

388. The proposal would be visible from a number of vantage points within the Conservation Area.
389. The majority of the Conservation Area comprises a dense, tightknit urban grain with a strong sense of enclosure to the street, establishing the sense of an intact historic townscape. High historic interest stems from notable surviving buildings from the 18th and 19th centuries, with a strong sense of group value expressed through the shared use of solid masonry facades, abundant classical modelling, and surface detail. A long-held concentration of banking and commercial activities has created a historic nexus of financial power and with its high historic associative interest. This is expressed through the sense of dramatic arrival at bank junction, experienced as a central node within the historic urban realm, and enhanced by the palatial quality of the Royal Exchange and Bank of England, which face onto the junction.
390. The setting of the Conservation Area is as varied and diverse as the overarching character of the City. Its most obvious border is with the City Cluster on the eastern edge, where there is a striking contrast in scale on opposite sides of Bishopsgate/Gracechurch Streets, mitigated. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east and strong juxtapositions between old and new. The character of Bank junction as a historical centre is therefore presently offset by views of tall buildings within the City Cluster to the east. The setting of the conservation area therefore makes a range of contributions to its significance, both neutral and low positive.
391. The existing building on the application site, at present, is a neutral component of the setting of the conservation area, seen in north-south views along the eastern boundary of the conservation area at Gracechurch Street.
392. The proposal would be visible from vantage points such as Lombard Street and the Bank Junction where it would be perceived in the distant backdrop as a fleeting, transient element alongside 20 Fenchurch Street. This would not be

an unusual relationship with the conservation area, with fleeting views of the City cluster depicting the dynamic contrast of the historical City in the foreground and new City exemplified as the cluster of towers as a distant backdrop. As such, the impact is not considered harmful.

393. In views north and south along Bishopsgate and Gracechurch Street, the proposal would also read as part of the cumulative Cluster of tall buildings. The podium of the tower has been designed with the neighbouring Bank Conservation Area in mind, with complementary materials, and a solid and robust masonry base, creating a positive dialogue with the scale and proportions of the Conservation Area opposite. The taller element of the tower would be perceived as part of the existing tall buildings in the background without overwhelming the prevailing scale of Gracechurch Street.
394. In the cumulative scenario, additional tall buildings, including 70 Gracechurch Street, would be visible from the conservation area, in the context of the proposed development. These cumulative schemes would also be seen in the context of the existing backdrop of tall buildings which is an established characteristic of the dynamic between the emerging new City and the historic townscape of the conservation area. In that scenario, the impact of the proposal would remain the same.
395. Overall, in both the baseline and cumulative scenarios, the proposal would result in a change to the setting of the Conservation Area, one that would be consistent with the established dynamic between the historic and modern financial buildings either side of Gracechurch Street, and not in a manner which would undermine its significance, which would be preserved

#### Leadenhall Market Conservation Area

396. The Leadenhall Market Conservation Area Character Summary and Management Strategy SPD (the SPD) prescribes the significance of the Conservation Area as deriving from the tangible and intangible vibrancy of the historic market, which is grafted onto a characterful crooked medieval street grid, with fine grain mixed-use and a predominant human scale of buildings, streets and spaces in marked, dramatic contrast to the immediate setting and identifies particular views.
397. Given the enclosed nature of the Conservation Area, in particular, the roof of the market, the proposal would be generally concealed from view. Where visible it would be appreciated alongside 20 Fenchurch Street in the backdrop. This relationship of tall buildings as a backdrop to Leadenhall Market is a characteristic element of the setting of Leadenhall Market with the historic buildings dominating the foreground of the views. It is considered that this

change resulting from the proposal would reinforce these contrasts which is a strong character trait of the Conservation Area, preserving its significance, including its special character and appearance.

### Other Heritage Assets

398. 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, employing 3d modelling, site visits and consideration of the submitted application material, was conducted so as to identify heritage assets the setting of which may be affected. As well as those assessed in preceding paragraphs, the designated heritage assets considered included but not exclusively so:

- St Pauls Cathedral Grade I
- The Ship Tavern Pub, Lime Street (Grade II)
- 81-82 Gracechurch Street (Grade II)
- 7-9 Gracechurch Street (Grade II)
- 7 & 9 Bishopsgate & The Royal Bank of Scotland (Grade II):
- Former Billingsgate Market, Lower Thames Street (Grade II)
- Leadenhall Market (Grade II\*)
- Cannon Street Station Towers (Grade II)
- Church of St Edmund the King, Lombard Street (Grade I)
- St Margaret Pattens
- Custom House (Grade I)
- 1, 13-14, 23-27, 28-30, 33-35, 39, 48 50 Cornhill (Grade II) and 15-22 Cornhill (Grade II\*)
- Church of St Michael Cornhill (Grade I)
- Church of St Edmund the King, Lombard Street (Grade I)
- Church of St Mary Le Bow, Cheapside (Grade I)
- Former Port of London Authority Building, 10 Trinity Square (Grade II\*)
- Cannon Street Station Towers (Grade II)
- Church of St Clement, Grade I
- St Peter Upon Cornhill (Grade I)
- Chapel Royal of St Peter ad Vincula (Grade I):
- Merchant Taylors Hall (Grade II\*)
- 66 and 67 Cornhill (Grade II)
- 2a; and 23 and 25 Eastcheap (Grade II)
- 48 Bishopsgate (Grade II)
- 40 Threadneedle Street (Grade II)

- Finsbury Circus Conservation Area and RHPG (Grade II)
- Barbican (Grade II, Grade II\* RHPG)

399. As a result of the scoping exercise, these assets were scoped out of the assessment above because officers judged that the proposal would not have the potential to impact upon their settings and the contribution made to significance. This is for a variety of factors, chiefly the relative distance of or minimal prominence of the proposal, or its limited to nil intervisibility, in the viewing experiences of these heritage assets. As such, the settings and the contribution they make to the significance of these heritage assets would not be adversely affected by the proposals.

### **Conclusions on Heritage**

400. The proposal would result in low levels of less than substantial harm to the Monument (Grade I), Tower Bridge (Grade I), and a slight level of less than substantial harm to the Eastcheap Conservation Area I). As such, the proposal would fail to preserve the significance/special interest or setting of these designated heritage assets and would conflict in this respect with Local Plan policies CS12 (1 and 2), DM12.1 (1), emerging City Plan 2040 S11 (2) and London Plan HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies. 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.
401. The proposals otherwise preserve the settings and significance of all other relevant designated heritage assets and comply with Local Plan CS14, CS 12 (3-5) CS13 and DM12.1 (2-5) and emerging City Plan 2040 S11 (1,3-5) S13, HE1.

### **Archaeology**

402. Section 16 of the NPPF and Policy HC1 of the London Plan require the conservation of archaeological interest as part of the planning process. Paragraph 200 of the NPPF obliges applicants to provide an archaeological assessment when development may affect heritage assets of archaeological significance. The City of London's Local Plan DM12.4 and emerging City Plan 2040 (Policy HE2) also emphasize the need to consider and protect archaeological remains during development.
403. The proposed development site is within the historic core of the City of London, an area recognized for its significant archaeological potential. The City's Local Plan designates the entire city as having archaeological potential unless

evidence shows that remains have been destroyed by prior developments, such as deep basements. The site has already been subject to two previous archaeological investigations in 1959 and 1995, which uncovered evidence of Roman and medieval activity, including a Roman masonry foundation, remains from the medieval church of St Benet Gracechurch, and a stone-lined medieval well and as such designated as a site of Additional Archaeological Significance.

404. The archaeological desk-based assessment submitted with this application confirms that the existing basements have removed most archaeological remains within their footprint. However, the assessment indicates that there is a moderate potential for deeply cut later medieval and post-medieval remains to survive outside the footprint of basement level 2. These remains, likely to be in the form of wells, may exist in areas beneath basement level 1, particularly in the south-eastern corner of the site. These features are of low heritage significance due to their fragmentary and isolated nature.
405. The proposed development includes the extension of basement level 2, which would extend into previously undisturbed areas, particularly to the south-east. The archaeological assessment notes that this extension would potentially remove any surviving archaeological remains within the expanded basement area. As a result, ground disturbance from new foundations, piling, and excavation in these areas could impact archaeological assets. However, remains within the existing footprint of basement level 2 have already been destroyed by past construction activities.
406. To manage the impact of the development on potential archaeological remains, the assessment recommends an archaeological watching brief during the ground reduction for the basement extension. This would ensure that any surviving remains are recorded appropriately before being disturbed. Any required archaeological work would need to be conducted in accordance with a Written Scheme of Investigation (WSI) approved by the local planning authority.
407. Historic England (Greater London Archaeological Advisory Service) have reviewed the archaeological assessment and advise that the significance of the asset and the potential scale of harm is such that any adverse effects can be managed through works being undertaken in accordance with a WSI, to be prepared and approved prior to the commencement of works. Historic England have recommended a condition to this effect.
408. The proposed development complies with relevant policies, including Local Plan DM12.4, emerging City Plan 2040 HE2, and London Plan HC1, subject to the recommended archaeological condition.



## **Public Access and Inclusivity**

### **Accessible and inclusive design**

409. Accessible and inclusive design is covered by NPPF paragraphs 96 and 135, London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and emerging City Plan 2040 Policy HL1. 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.
410. London Plan D5 sets out how development should be informed by an inclusive design statement and detail engagement with relevant user groups. A Design and Access Statement has been prepared by 3XN which incorporates a Planning Access Statement prepared by David Bonnett Associates (July 2024). The statement considers the requirements of all users, visitors, staff and wider community that are anticipated to be present in the proposed development once complete.
411. The site is well-served by public transport, noting that public transport is not accessible to all people. Key step-free points of arrival by train and underground are greater than 50m from building entrances. Bus stops are no more than 50m from the site. Some building users cannot access public transport and suitable drop-off points are recommended in best practice guidance BS 8300. It is recommended that setting-down points for taxis and private vehicles are considered as part of the Travel Plan to be secured under a S.106 obligation.
412. London Plan Policy T6.5 states that all developments should be car-free except for at least one on, or off-street disabled persons parking bay. There are no existing on-street disabled parking bays within proximity of the development. One accessible parking space is provided within the development, in the Undercroft. This will be on the ground floor area of open public realm, and accessed from Gracechurch Street through moveable bollards which can be controlled from the Dockmaster office, located at the ground level. Due to site constraints, the application proposes to use the Undercroft area for dual purposes throughout the day. In the day it will serve an area of open public realm offering an accessible car parking bay at the south side. The accessible bay is close to the accessible lift leading to a passage and the lift core, and to the stair, and retractable stair lift leading to the northern entrance and amphistair. Between 23:00 and 7:00, the Undercroft area will be used for servicing and the accessible car parking area will offer space for loading and unloading to servicing vehicles. Management and use of the accessible car parking space will form part of details reserved as part of the Travel Plan to be secured under S.106. A condition is also recommended to ensure that the

space is free for use by disabled drivers for the life of the development. Further details are required of the passive electric charging points for vehicle and mobility scooter charging, which will be reserved under S.106 obligation and under a planning condition, respectively.

413. Standards for inclusive cycling are in London Cycle Design Standards (LCDS) Chapter 8. The LCDS state that 5% of long, and short-term spaces should accommodate larger and adapted cycles with associated facilities. The cycle entrance to the long stay cycle parking is accessed from the northeast side of the building at Fenchurch Street, via a clearly identifiable cycle entrance. On entry there are three lifts designed to LCDS, which would offer access to the basement cycle parking. Provision has been made for 14 short stay cycle parking spaces in the Undercroft by way of Sheffield stands, including one accessible space. Details of access to, and layout of accessible cycle storage bays would be secured by condition to ensure clear and easy access to the accessible cycle storage, and that the dimensions of the lifts and cycle storage bays are consistent with dimensions in LCDS. No more than two doors are proposed on cycle access routes, and they will be automated as required by LCDS. End of trip facilities include accessible shower space provided on the same level as accessible cycle storage, as well as on B1 mezzanine.
414. The design of the proposed development has been informed by sensorial mapping and a biophilic focus. The Undercroft has the potential to create an area of respite from the hard surfaces and sensory stimuli of the street. Details of all surfaces are reserved by condition to ensure that they minimise sensory load. Biophilic design is a particularly important tool in designing for neurodiversity, and is welcomed.
415. London Plan D5 says that entrances should be inclusive without involving additional effort, special treatment or separation. Revolving doors are not inclusive of a range of people and reinforce separation. At the main and secondary entrance to the building, access is proposed to be provided by revolving drum type automated doors. Drum doors with sliding doors can be significantly more inclusive. Details of proposed entrances are reserved by condition to ensure that there is equitable access including level thresholds, appropriate flooring, tactile paving, sufficient contrast on door furniture, and appropriate use of manifestation, as relevant.
416. There is a significant level change across the site and step-free entrance routes are separate at both north and south entrance points. There will be an accessible lift integrated into the steps from the Undercroft to the café and the main ground floor lobby area. There will be a second accessible lift to the south entrance to gain access to the passage leading to the lifts for the public spaces at level 35. This lift will also be used for servicing.

417. Traditional platform lifts require continuous pressure on a button for the duration of the journey and are not suitable for a range of people. Building regulations say that they should only be used for existing buildings and in 'exceptional' circumstances. Details of the proposed lifting devices are recommended to be reserved by condition to ensure that the lifts are of sufficient quality to support dignified and independent use and to minimise additional effort. The public lifts would be secured under S.106.
418. Entrance to the offices from the north of the proposed building would lead to the first floor reception via two escalators and a feature amphistair. Further access to level 2 is provided from level 1 by two additional escalators. The amphistair will include recesses for people in wheelchairs at top and bottom of the stair, as well as seating options with arm and back support to provide choice for a range of people. Suitable contrast and handrails will also be required for this stair. Details of the stair are reserved by condition. People requiring step-free access will travel past the stairs and escalators to two passenger lifts. As there are not clear sightlines from the northern entrance to these lifts, wayfinding and directional signage will be particularly important and therefore details would be reserved by condition. Subsequent office levels (levels L01 to L34) would be served via passenger lifts from levels one and two. Details of vertical circulation including lifts and steps are reserved by condition.
419. Horizontal circulation such as the effective clear widths of internal doors and security barriers, widths of corridors and passing places and circulation routes would be step-free and would meet minimum requirements and are satisfactory.
420. London Plan 2021 Policy D5 states that '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'. There will be an evacuation lift and separate firefighting lift for lift cores subject to the limits set out in the Fire Strategy. Refuge points and visual alarms will be provided as well as two-way communication. Carry-down/up systems are not considered dignified and not supported in the London Plan. Details of escape routes for disabled people including where there is not a separate firefighting and evacuation lift as well as details of appropriate training and provision of Personal Emergency Egress Plans (PEEPs) for people who may require assistance in case of an emergency are reserved through the IAMP.
421. The publicly accessible spaces at level 35, including the Sanctuary, Garden (roof terrace) and the Learning Space, will be accessed from the separate passage and lift core to the east of the site. All visitors to these areas will use this lift to access and exit the public areas. The visitors will arrive at the Undercroft and through a set of stairs or an adjacent accessible lift which will

be operated independently, visitors are then directed to the check-in point and security checks and to the passage. The passage will be wide enough for wheelchair users to pass and will be a curated space leading to the visitor lift. There is step-free access to this lift from the accessible lift to the south of the site or from the lobby area from the north. Music and lighting will also be curated for the lift with associated potential for sensory overload. Details of the lift lighting and music curation are reserved by condition. Public access would be managed with pre-booking or walk-up ticket sales and organised groups of school children and their teachers. Details of the website information would be secured by the IAMP to ensure an accessible and inclusive booking system for tickets. The IAMP would also reserve details of inclusive security arrangements to minimise separation and ensure a dignified route into the building for a range of people. Provisions for queuing and waiting in the passage will also be reserved under the IAMP.

422. The proposals offer an opportunity for inclusive and free learning. The Learning Space would form a space that schools would be able to book in advance for educational workshops, seminars and field trip activities in a dedicated and accessible location. To support these activities, the space would provide step-free access, shallow stairs, and wider walkways, doors, stairwells as well as its own wardrobe and toilets provided adjacent to the learning space to ensure accessibility for all students. The cultural plan suggests that engagement with numerous schools has informed the provision and location of these facilities. Details of these elements as well as consideration of the provision of a quiet area for rest and recovery would be requested under accessibility conditions and the IAMP to support the function, inclusivity and accessibility of this area. A Cultural Implementation Strategy would be secured under S.106 where the applicant would be required to incorporate inclusive cultural provision with reference to opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering in relation to the cultural offer.
423. The proposal incorporates the placement of seating and planting to allow suitable access routes around the terraces. Areas of landscape should have surfaces that are stable and slip-resistant and paths that provide passing spaces that are wide enough for wheelchair users to pass, at regular intervals. Areas of seclusion and shelter and a choice of seating options are more inclusive of a range of people. Seating should be at a range of heights with options for backrests, armrests and include recesses for people in wheelchairs, with buggies, or with assistance animals to sit alongside their companions. Conditions requiring details of the landscaping for the terraces are recommended to include full details on paving materials, layout and seating designs for assessment against accessibility and inclusivity standards and best practice.

424. It is noted that quiet rooms for rest and recovery are not identified through the development. The next stage of the design process could identify suitable locations. Conditions for provision and identification of these areas have been recommended.

### **Toilets and Changing Places**

425. Toilet provision will allow for no more than 40m travel within the building to a wheelchair accessible toilet and options for both left and right hand transfer are identified. Layouts are reserved by a condition requiring an inclusive toilet strategy. Ambulant toilets are also proposed. Details of the proposed ground floor toilets within the building, including associated signage to facilitate their identification by the public are reserved by condition.
426. Changing Places toilets are designed for people with multiple and/or complex impairments and up to two companions. They are not intended for independent use. Changing Places toilets are triggered by the criteria set out in Building Regulations Approved Document M. Places of assembly of more than 350 will routinely trigger a requirement for a Changing Places toilet. At present, the capacity of the Sanctuary and Learning Space is 165 people and one has not been identified in association with the development. However, the next stage of design development may demonstrate that one is required, particularly as numbers are combined. Single sex toilet facilities and ambulant toilet facilities are also required to meet the recently-revised Building Regulations for toilets. Accordingly, an inclusive toilet strategy with relevant layouts is recommended to be reserved by condition.

### **Conclusion of public access and inclusivity**

427. Overall, the proposal accords with London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and emerging City Plan 2040 Policy HL1. Subject to further details reserved by conditions and Section 106 agreements the proposed development is considered to be acceptable. The greening of the Undercroft would create a new publicly accessible respite area that is shared with a managed accessible parking space, which is welcomed. The step-free access into the site at all the entrances and internally would contribute to making an inclusive City and, subject to high quality lifting devices and their management, is welcomed as part of the proposals.

### **Highways and Transportation**

#### **Surrounding Highway Network and Site Accessibility**

428. The development is bounded by Gracechurch Street to the west, Fenchurch Street to the north, St Benet's Place to the south, and 6-10 Fenchurch Street associated private courtyard to the east. The site is on the corner of the signalised junction with Gracechurch Street, Lombard Street and Fenchurch Street. Gracechurch Street is part of the Transport for London Road Network (TLRN).
429. Public Transport Accessibility Level (PTAL) for this development is 6b, which is the highest PTAL level. This score was derived using TfL's WebCAT service.
430. The parking restrictions operate on the City of London (CoL) streets, Monday to Friday, from 7am to 7pm, and Saturday, from 7am to 11am (except Christmas Day, Good Friday or a Bank Holiday). The waiting restrictions operate on the nearby street, at: Fenchurch Street, Whittington Avenue, Cornhill, Corbet Court, Leadenhall Place, Philpot Lane, and there are loading restrictions in place on parts of the Cornhill Lime Street and Leadenhall Place.
431. This proposal is a mixed-use development, consisting of the office building (Class E(g)(i)) 52,012 sqm , Retail / Café (Class Ea) / E(b)) 187 sqm; Publicly Accessible Areas on the Level 35 (Sui Generis) 611sqm; Learning Space 83sqm.

### **Access**

432. In terms of access, the existing building provides one pedestrian access from Gracechurch Street to the existing offices and two access points for the retail units, one of which is very close to the junction and the other is on the Fenchurch Street. The combined vehicle and cycle access is from Gracechurch Street.
433. This proposal creates several pedestrian access points, being the main access near the junction Gracechurch Street with Fenchurch Street and four other access points, three of which are situated along the Gracechurch Street and the fourth is from St Benet's Place. The area known as the Undercroft is attracting people from all four access points, channelling them through a few stairs and along the sliding doors to the café area and foyer.
434. For cyclists, two accesses have been created, the main is from Fenchurch Street and the other is from Gracechurch Street.
435. A dropped kerb is proposed on Fenchurch Street to facilitate cyclists moving into the building. This proposal has been considered and would form part of the S.278 Highways improvements works which would be secured via the S.106 agreement. The design is subject to road safety audits and details.

436. The only vehicle access, which serves the disabled parking and activities associated with deliveries/servicing and /waste/recycling is from Gracechurch Street.
437. The Undercroft area would facilitate deliveries, servicing, waste and recycling from 11pm to 7am, Monday to Sunday. Outside this period, Undercroft serves a different function, primarily used by pedestrians and also providing parking for disabled users of this development.
438. Although vehicle access is nearby the same position as the existing one, minor modifications are likely required to facilitate the proposal. Since vehicular access is on Gracechurch Street, where TfL is the Highway Authority, the proposed changes require TfL's technical approval on design details.
439. For the above, the applicant is required to enter into a Section 278 agreement with TfL, for the highways alterations proposed on Gracechurch Street.

#### **Public realm and highway improvements**

440. This proposal includes public realm and highway improvements to make this application acceptable in planning terms. It comprises the widening of the footways and resurfacing of the public highway to improve walking, wheeling and cycling on Gracechurch Steet and Fenchurch Street.
441. The footways along Gracechurch Street and Fenchurch Street, fronting this development, were widened in response to Covid-19 measures. At the time of this intervention, temporary surfacing materials and bollards were used. TfL has confirmed that these changes are to be made permanent and are seeking to secure a S.106/S.278 contribution from this development.
442. The highways improvement schemes would be designed in line with the Healthy Streets principles, with works secured through the S.278 agreements via the S.106. The applicant will cover the costs of designing the scheme and implementing the works.
443. In order to improve accessibility and remove barriers for disabled people coming to and from this development, a review of rest points at 50m intervals from principal points of arrival by public transport shall be undertaken. Conclusions and consideration of additional benches along the S.278 sections shall be incorporated when designing the highways improvement schemes.
444. The Highway Authority (HA) on the Fenchurch Street is the City of London, whereas for Gracechurch Street the HA is TfL. If consented, the applicant is required to enter into a S.278 agreement with both Highways Authorities,

covering the design and delivery of highways improvements on their respective sections.

- 445. The proposal includes public highway oversailing on Gracechurch Street on which TfL is the Highway Authority, and Fenchurch Street for which CoL is the Highway Authority.
- 446. The submitted drawings show the height of the over sail to be over 7.97m from the base ground level on both streets but it does not include details on the protruding from the building onto the public highway. Further details to be provided and approved as part of a separate oversail licence (Section 177 of the Highways Act). Other details to include how the applicant proposes to minimise the risk of items falling on the public Highway, including details on maintenance of the façade without the need to close public highways to do so.
- 447. This proposal does not include stopping up of the highways or the under sail over the public highways.

### **Car parking**

- 448. The existing vehicular access is from A10 Gracechurch Street and the proposal retains its location, although some minor modifications are probable. The works to make changes to the access would form part of the S.278 agreement. Since this falls within the TLRN, the agreement will be between TfL and the applicant.
- 449. In terms of provision the existing site has an area that can accommodate 9 car parking spaces, 10 motorcycle spaces and 40 cycle parking. This area also facilitates the servicing, deliveries and refuse recycling pick up.
- 450. This proposal is car free development, with one disabled car parking space at the ground level, accessed approximately through the same point as the existing.
- 451. Policy T6 of the London Plan, sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking. Policy DM 16.5 of the Local Plan requires designated Blue Badge holders parking must be provided within developments in conformity with London Plan requirements. London Plan Policy T6.5 for non-residential elements of the development is relevant. The Policy indicates the levels of provisions to be in accordance with the Table 10.6, to ensure that all non-residential parts of a development provide access to at least one, on or off-street, disabled parking bay. A car-free development must provide parking for the disabled people.



452. The emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, states that 'The City's transport infrastructure will be maintained and improved, by minimising road danger and congestion, and reducing vehicle emissions by: a) Not providing any additional on-street car and motorcycle parking; b) Identifying opportunities to use on-street parking restrictions to discourage private vehicle use; c) Designing and managing streets in accordance with the City of London street hierarchy.
453. One disabled parking space is included in this proposal. It would be available for use during the development's operating hours, which are from 7am to 11pm.
454. On the public highway nearby there are few disabled car parking spaces, with closest located at George Yard (145m), followed by the EastCheap (250m), Mincing Lane (290m). These designated disabled bays can be used for up to four hours on weekdays, and no limits on the weekends.
455. Although it is accepted that public transport provision at this location is of the highest level possible a Travel Plan (TP) is recommended, secured through S.106 obligation. The first principle of the TP is to support disabled people associated with this development through various measures. Each disabled staff member to have a tailored travel plan detailing how they get to and from the site and supported through different initiatives. Similarly, disabled visitors to this development can request support for their travel, if public transport does not meet their needs. Not all nearby underground stations have step-free access, which means that some users of this development may require additional support. Measures such as arranging a pick-up from a nearby underground station with step free access, or pre-arranged locations must be considered, and could form part of the travel plan measures to support the disabled people.
456. The applicant is required to keep records and manage the demand for disabled car parking spaces. In addition, details on facilitating alternatives to car parking for disabled users (staff and visitors) for all land uses included in this development, will form part of the TP. The action plan with initiatives is to be submitted for review to the LPA annually.
457. Further details would be secured under the S.106 including management and the criteria for the use of the accessible car parking space. These details would be requested under the Travel Plan and shall include, but not limited to, the following:
- The disabled car parking space is available at all times to users of the building, except the hours from 11PM to 7AM, when the use of the parking area requires a permission from the management company. Out

of hours parking slots could be available, if that area of the Undercroft is not required for delivery and servicing activities.

- Responsibility for allocation of the car parking space, enforcement of parking contraventions.
- Criteria for applying to use the disabled car parking space, details on how the decision is made if more than one user is requiring the space at the same slot.
- Using the disabled car parking space is free of charge, in perpetuity, for employees of the building and other users of this building.
- Passive Electric Vehicle Charging (EVC) point to be included, with the plan to make it active charging point.
- Keep records of the car parking demand and the occupancy levels. Upon request, the applicant would need to submit records to the LPA.

### **Cycle parking**

458. The existing site has 40 cycle parking spaces. On the public highway nearby, there are 4 docking stations with 69 cycle parking spaces.
459. Policy DM 16.3 of the Local Plan, requires applicants to provide on-site cycle parking spaces in accordance with the London Plan standards and exceed the standards when feasible. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.
460. The London Plan, Policy T5 Cycling indicates that development proposals should remove barriers to cycling and create a healthy environment in which people choose to cycle, through:
- supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure.
  - securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards.
461. The level of cycle provision is dependent on the location of the development. The City of London (CoL) is in an area where higher minimum cycle parking standards apply.

462. This proposal includes a total of 849 (long stay) and 41 (short stay) cycle parking spaces. Policy T5 of the London Plan has cycle parking standards for different land uses. The table below shows the requirement and provision.

Table 3. Proposed cycle parking against London Plan requirements

Use Class	Floor Area sqm GEA)	Long Stay	Short Stay
Former B1 business offices	63,361 sqm;	1 space per 75 sqm (GEA) 845	First 5ksqm=1 spaces per 500sqm; thereafter 1 space per 5k sqm (GEA) 20
Former A2 -A5 Retail / Café (Class Ea) / E(b)) 205 sqm;	205 sqm;	1 space per 175 sqm (GEA) 2	areas with higher cycle parking standards: 1 space per 20 sqm (GEA) 11
Sui Generis ) former Sui Generis closes to former D2 sports hall swimming gym)	651sqm	1 space per 8 FTE staff 1	1 space per 100 sqm (GEA) 7
Learning Space (former D1 primary to six form)	88 sqm	1 space per 8 FTE staff + 1 space per 8 students 1	1 space per 100 students 1
<b>Total</b>		<b>849</b>	<b>41</b>

463. The cycle parking proposed mix is: 42 Sheffield stands (5%); 523 two tier racks (61%); 242 locker type (29%) and 42 accessible spaces (5%). In addition this proposal includes cycle facilities, that is 849 lockers and 73 showers, which are located in the basement and mezzanine level.

464. The number of cycle parking spaces is compliant with the policy, however the policy recommends that up to 10% be of the locker type. Further details on the location and type of the cycle parking will be secured by condition.
465. The second principle of the TP is promoting the cycle parking through the action plan. The targets for the cycle parking to be contained within the TP and are expected to be achieved within the 5 years. The applicant would be required to submit annual report for review, as part of the TP secured via S.106.

### **Deliveries and Servicing**

466. Under the current City's Transport Strategy and its proposals and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, states that 'The City's transport infrastructure will be maintained and improved, by minimising road danger, congestion, and reducing vehicle emissions by:
- Designing and managing streets in accordance with the City of London street hierarchy;
  - Minimising the impact of freight and servicing trips through such measures as the provision of on-site servicing facilities, the timing of deliveries outside peak hours, the adoption of area-wide solutions, freight consolidation and promoting deliveries by foot or bicycle;
  - Facilitating essential traffic, including emergency service vehicles, buses, freight and private transport for people with particular access needs, whilst minimising the environmental impact of these modes;
  - Requiring the provision of infrastructure for alternative-fuel vehicles and zero emissions vehicles, such as off-street vehicle charging points."
467. In addition, part h of this Policy, states that developers must demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimised as a result of their development, promoting best practice such as direct vision standards, and zero vision policies to minimise danger of travel and servicing, including through the use of river transport. This is in line with adopted policies of the Local Plan 2015, Strategic Policy CS16.
468. The Undercroft, functions as a dual-purpose area, making an efficient use of the available ground floor space. During the daytime hours (07:00 to 23:00), the area will be used as a public realm and open space and parking for the disabled

people, whereas during overnight hours (23:00 to 07:00), it will be facilitating delivery, servicing, refuse and recycling activities.

469. There are two servicing bays in this area to accommodate movements associated with the type of vehicle needed to complete such activities. Swept path analysis were undertaken, showing that the 7.5t (8m) box van can access and egress the loading bays.
470. Trips generated for servicing and deliveries activities are based on the assumption that 0.22 deliveries are required per 100sqm for Class E (office use), whereas for the retail the rate is calculated at 1.35 per 100sqm. When this methodology is applied for the proposal with 52,012 sqm (GIA) of office space, it is estimated to generate 114 deliveries per day, whereas for 187 sqm (GIA) retail/commercial/sui generis land use the demand is 3 deliveries per day, making this a total of 117 trips per day.
471. If 75% of consolidation is applied to the 114 daily trips, 30 trips per day are required for delivery and servicing purposes, for office use. For each delivery, two trips are required, (IN/OUT movements), therefore the expected number of deliveries is 15, within the 24h period. When retail use is added, the total number of trips for this development increases to 32. Therefore, a total 16 deliveries per day are required to facilitate this development, which is considered acceptable.
472. The table below shows the modal split, two way trips required (office and retail), with and without consolidation.

Table 4. Modal split by land use

<b>Mode</b>	<b>% Modal split (office)</b>	<b>No consolidation</b>	<b>With 50% consolidation</b>	<b>With 75% consolidation</b>	<b>% Modal split (retail)</b>	<b>No consolidation</b>	<b>With consolidation</b>	<b>Total development* 2 way trips</b>
Motorcycle/scooter	4	5	3	2	0	0	0	2
Car	34	39	19	10	25	0	0	10
LGV	53	60	30	15	25	1	1	16

Rigid 3 axle (HGV)	9	10	5	3	50	2	1	4
Rigid 4 axle (HGV)	0	0	0	0	0	0	0	0
<b>Total</b>	<b>100</b>	<b>114</b>	<b>57</b>	<b>30</b>	<b>100</b>	<b>3</b>	<b>2</b>	<b>32</b>

*\* adjusted to even numbers to represent the 2 way trips*

473. The proposal is accepted with criteria that the delivery and servicing daily trips are reduced by 75%, using the consolidation centres. The applicant has accepted that the number of deliveries/servicing trips is capped and that the proposed mix is as per the table above.
474. In addition, a booking system is required under S.106 that manages and allocates delivery/servicing slots for land uses of this development. This is to ensure safety on the public highway and no queuing in and around the area, known as the Undercroft. Also, the system must keep records of all trips generated following the occupation, and data kept thereafter. The trip records to be presented to the CoL upon request to ensure compliance.

### **Refuse/ Recycling**

475. The refuse/ recycling storage area is located in the basement. The waste is brought up to the ground floor at the Undercroft area just before the collection takes place.
476. To ensure no conflicts with delivery/ servicing activities, and to comply with the criteria on the hours of its use, it is recommended that collection of refuse/recycling is part of the same system that manages the delivery/ servicing slots. The allocated slots for refuse/recycling can then be reviewed periodically to suit different parts of this proposal but must be done with prior agreement to all parties occupying this development. This ensures that the Undercroft area is managed within the allocated times and facilitates different requirements.
477. Further detail regarding the refuse/ recycling matters, for example requesting the pick up points while not conflicting with other activities within the building to be secured as part of the Servicing and Delivery Management Plan via S.106 obligation.

### **Demolition / Construction Logistics Plans (CLP)**

478. The London Plan, Policy T7 on deliveries, servicing and construction, indicates that developments must address their impacts during the construction phase and following the occupation after the site is operational.
479. Policy D16.1 of the Local Plan supporting paragraph 3.16.11 and the emerging City Plan 2040 Policy VT1 state that Construction Logistics Plans (CLP) will be required for all major developments, or refurbishments and for any developments that would have a significant impact on the transport network during construction.
480. A CLP was submitted and considered acceptable as an outline document. Nevertheless, a detailed Demolition and Construction Management Plan would be secured through planning condition. The document to comply with measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites and in accordance with TfL's latest guidelines. The detailed DCMP to show how construction vehicles will be managed during the demolition and construction phase, and in line with the principles of three Rs, that is, Reduce, Re-time and Re-mode.

### **Conclusion of Highways and Transportation**

481. The proposals are considered acceptable in transport terms, provided the applicant complies with the recommended S.106 obligations and planning conditions.

### **Environmental Impact of Proposals on Surroundings**

482. Local Plan Policy DM10.1 requires the design of development, and materials used to ensure that unacceptable wind impacts at street level and in the public realm are avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy DM10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Emerging 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**

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

484. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and buildings 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 five Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.
485. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
486. 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 result of development. If wind conditions become windier but remain in a category suitable for the intended use, or if there is a negligible or beneficial effect, winds mitigation is not required. For ease of reference, the following tables are extracted from the ES and set out the criteria for on-site and off-site measurement locations based on the City Lawson criteria within London.

Table 5. Scale of Effect Criteria for on-site measurement locations (extract from Table 9.5 of Chapter 9 of ES)

Scale of Effect	Trigger	Required Mitigation
Major Adverse	Conditions are 'unsafe'	Yes
Moderate Adverse	Conditions are 'unsuitable' (in terms of comfort) for the intended pedestrian use	Yes
Negligible	Conditions are 'suitable' for the intended pedestrian use	No
Moderate Beneficial	Conditions are calmer than required for the intended pedestrian	No



	use (by at least one comfort category)	
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Table 6. Scale of Effect Criteria for off-site Measurement Locations (extract from Table 9.6 of Chapter 9 of ES)

Scale Effect	Trigger	Required Mitigation
Major Adverse	<p>Conditions that were 'safe' in the baseline scenario become 'unsafe' as a result of the proposed development.</p> <p>OR Conditions that were 'suitable' in terms of comfort in the baseline scenario become 'unsuitable' as a result of the proposed development.</p> <p>OR Conditions that were 'unsafe' in the baseline scenario are made worse as a result of the proposed development.</p>	Yes
Moderate Adverse	Conditions that were 'suitable' in terms of comfort in the baseline scenario are made windier (by at least one comfort category) as a result of the proposed development, but remain 'suitable' for the intended pedestrian activity	Desirable
Negligible	Conditions remain the same as in the baseline scenario.	No
Major Beneficial	Conditions that were 'unsafe' in the baseline scenario become 'safe' as a result of the proposed development.	No
Moderate Beneficial	<p>Conditions that were 'unsuitable' in terms of comfort in the baseline scenario become 'suitable' as a result of the proposed development.</p> <p>OR Conditions that were 'unsafe' in the baseline scenario are made better as a</p>	No

	result of the proposed development (but not so as to make them 'safe')	
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487. Assessments of the wind tunnel testing has been carried out for both the windiest season to show the worst-case scenario conditions and the summer season for amenity spaces that tend to be used most frequently during that period, for all locations. This is covered in Chapter 9 of the Environmental Impact Statement Volume 1. The CFD assesses the windiest and summer seasons for all locations as well.
488. The wind tunnel testing and CFD results broadly give the same assessment results. However, variance can occur 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.
489. The wind tunnel assessment across the site was tested for the following configurations:
- Configuration 1: Existing Baseline (all of the existing site and existing buildings within an approximate 450m radius of the site in addition to 17/00447/FULEIA (as amended by 19/00300/NMA) 6-8 Bishopsgate and 150 Leadenhall Street; 18/00740/EIA Leadenhall Court, 1 Leadenhall Street; 13/01004/FULEIA 40 Leadenhall Street; 14/00178/FULEIA Bank Station Upgrade; 18/01178/FULMAJ Seal House 1 Swan Lane).
  - Configuration 2: Proposed development with existing surrounding buildings:
    - a) Proposed development with existing surrounding buildings (with existing and proposed landscaping – no additional mitigation);
    - b) Proposed development with existing surrounding buildings (with existing landscaping, proposed landscaping and mitigation on site).
  - Configuration 3: Future Baseline – Tier 1 (all of the existing site and existing buildings within an approximate 450m radius of the site in addition to consented developments at the time of testing, which include 16/00075/FULEIA 1 Undershaft; 18/00152/FULEIA 100, 106 & 107 Leadenhall Street; 19/00713/FULMAJ Fountain House 130 Fenchurch Street; 19/01307/FULEIA Site bounded by Fenchurch Street, Mark Lane, Dunster Court and Mincing Lane; 20/00671/FULEIA 55 Gracechurch Street

(55GC); 20/00816/FULEIA 70 Gracechurch Street (70GC); 22/01155/FULEIA 85 Gracechurch Street; 22/00882/FULMAJ 65 Crutched Friars; 22/01245/FULMAJ 47-50 Mark Lane, London, EC3R 5AS; 16/00345/FULMAJ 153 Fenchurch Street, London, EC3M 6BB; 22/00981/FULEIA 55 Bishopsgate, as well as existing landscaping).

- Configuration 4: Proposed with mitigation in Future – Tier 1 Cumulative Surroundings (proposed Development with Tier 1 cumulative schemes, as listed above, and all existing landscaping, proposed landscaping, and mitigation on site).
- Configuration 5: Future Baseline – Tier 1 and 2 (all of the existing site and existing buildings including Tier 1 cumulative schemes, as listed above, and additional schemes pending consideration 24/00021/FULEIA Bury House 1 - 4, 31 - 34 Bury Street; 23/01423/FULEIA 1 Undershaft; as well as existing landscaping).
- Configuration 6: Proposed with mitigation in Future Tier 1 and 2 Cumulative Surroundings (proposed development with Tier 1 and Tier 2 cumulative schemes, as listed above, and all existing landscaping, proposed Landscaping, and mitigation on site).

490. A two tier cumulative assessment has been undertaken due to the variation in the statuses of nearby schemes and planning applications. The primary cumulative assessment (Configurations 3, 4 and 5) comprises of 11 cumulative schemes which all have been granted permission. In addition, a secondary cumulative assessment (Configurations 5 & 6) comprising all cumulative schemes plus 2 cumulative schemes that were submitted prior to the submissions of this planning application but are not determined at the time of the testing, has been undertaken.

491. A separate CFD assessment comprising the site and the surrounding area within a 400m radius of the centre of the site has been carried out by RWDI in accordance with the CoL Wind Microclimate Guidelines. The CFD results have been broadly compared to the wind tunnel assessment with emphasis on the differences found in terms of significance.

492. The CFD assessment includes the following Configurations:

- Configuration 1: Existing Baseline (same as Configuration 1 of the ES)
- Configuration 2: Proposed Development in Existing Surroundings (same as Configuration 2 of the ES)

- Configuration 3: Proposed Development with Tier 1 Cumulative Schemes (similar to Configuration 4 of the ES but without additional mitigation measures)
- Configuration 4: Future Baseline including Tier 1 Cumulative Schemes (same as Configuration 3 of the ES)

493. The CFD did not include a configuration with Tier 2 cumulative schemes as it was not expected these buildings would affect the results of the assessment.

494. With the introduction of Tier 1 and Tier 2 surroundings, some of the measurement locations as identified in Configurations 1 and 2(a and b) would be altered and some new would be introduced. For example this could occur where a new entrance is introduced to a previous thoroughfare location. For ease of reference, the table below (data extracted from Table 9.11 of the ES Chapter 9) summarises the new or altered measurement locations.

Table 7. Introduced and altered measurement locations due to introduction of the Tier 1 and Tier 2 surroundings

Measurement location	Baseline Receptor Sensitivity	Baseline Max Threshold Target	Proposed Receptor Sensitivity	Proposed Max Threshold Target
171,175, 178, 182-192	N/A	N/A	General Public Access and Cycling (ground floor 70GS Undercroft and new passage)	'Occasional Sitting' in summer is preferable and 'Standing' in the summer is tolerable
129	N/A	N/A	Entrance (Lime Street)	'Standing' in all seasons
176,177	N/A	N/A	Entrance (70GS new passage)	'Standing' in all seasons
121,127, 193-194	Entrance	'Standing'	General Public Access and Cycling (ground floor 70GS Undercroft)	'Walking'

206	General Public Access and Cycling	'Walking'	Entrance (Fenchurch Street)	'Standing' in all seasons
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495. 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.
496. The City of London Lawson criteria defines the safety limit as 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.
497. 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
498. There are also four criteria for determining the magnitude of change/impact to a receptor:
- Large: Safety exceedance
  - Medium: two categories above the criteria
  - Small: one category above criteria
  - Negligible: within suitable criteria
499. The City of London Lawson Comfort Criteria are as follows:

- Frequent sitting
- Occasional sitting
- Standing
- Walking
- Uncomfortable

500. It is highlighted that the design of the proposed development as submitted in July 2024 was slightly changed primarily to introduce a step in approach on the south-west façade. Therefore, an addendum of Chapter 9 (Wind Microclimate) of the ES was prepared and full re-consultation was undertaken on 22<sup>nd</sup> October 2024. The addendum includes additional CFD studies carried out by RWDI including an analysis of the cumulative configurations. No additional wind tunnel testing was carried out as the updated scheme was not considered to create new risks in the wind conditions previously tested. The updated CFD assessment demonstrates no material changes to the original assessment occurred due to the proposed amendments. Further details would be discussed below.

501. The addendum Chapter (October submission), took into account two cumulative schemes for which planning applications have been submitted since the submission of the application's submission in July. These schemes are, 70 Gracechurch Street (24/00825/FULEIA), which forms an update to the existing consent for this site mentioned in the cumulative schemes in the configurations above, and 99 Bishopsgate (24/00836/FULEIA). However, in relation to the latter, 99 Bishopsgate is situated far from the application site and the ES did not include it in the assessment. Furthermore, the planning permission at 55 Gracechurch Street (20/00671/FULEIA) (site adjacent to the application site to the south and east) has lapsed since July's submission for this application and therefore the scheme has been removed from the cumulative assessment.

**Configuration 1: Existing Baseline**

502. The baseline conditions are generally calm around the site and along the neighbouring Gracechurch Street and Fenchurch Street. Higher wind conditions are seen around the Walkie Talkie (tower at 20 Fenchurch Street). The independent CFD assessment results reported similar wind conditions ranging from suitable for frequent sitting to walking use during the windiest season, with areas of walking conditions mainly situated around 20 Fenchurch Street and to the north along Gracechurch Street and Leadenhall Street.

503. For ease of reference, the figure below is an extract from the ES (Figure 9.2 of Chapter 9) and shows the ground level measurement locations for Configuration 1.



Figure 1. Configuration 1 Measurement Locations

504. The on-site receptors identified are the two entrances and the areas of general public access along Gracechurch and Fenchurch streets. In first instance, the conditions were found acceptable for their intended use and at second instance the footway areas are not considered to exceed the pedestrian safety limit. The CFD assessment also did not identify an on-site pedestrian safety exceedances.

505. The off-site receptors identified in the ES are main entrances (including bus stops), outdoor occasional sitting spaces and areas for general public access and cycling, as shown in Figure 9.2 (of Volume 1, Chapter 9: Wind Microclimate) of the Environmental Impact Statement (ES). Conditions at the entrance of 159 Fenchurch Street (measurement location 93) are walking conditions in both summer and winter which is unacceptable for the existing use. Further measurements at the Sky Garden entry points (measurement locations 46, 50), 10 & 158 Fenchurch Street (measurement locations 116 and 89 respectively) and the entrance at 10 Plantation Lane, Rood Lane (measurement location 76) also record the same unacceptable walking

conditions for entrances at winter only. Conditions at the remaining off-site entrances as well as the outdoor occasional sitting spaces and areas for general public access and cycling are within acceptable limits for their existing uses. Overall, no locations were identified to exceed the pedestrian safety limit. The CFD assessment predicted strong winds to occur to the north along Gracechurch Street and Leadenhall Street, however, it is noted that these areas are at a significant distance from the site and conditions will be sensitive to the geometry of nearby towers (e.g. 1 Leadenhall) and local wind mitigations in these areas.

### **Configuration 2: Proposed development in Existing Surroundings**

506. The proposed development includes a 36 storey building and public realm works along the frontages of Gracechurch and Fenchurch streets. A public realm area (the Undercroft) would be located at ground level with open access to the southwest (Gracechurch Street) of the site. The space is a covered area as it lies beneath the massing of the proposed building. The intended use of the Undercroft is to offer a daytime public sitting, blue badge car parking, visitor bike parking, and the arrival point of those visiting the upper level public areas. During night hours this space would turn into servicing area. The area would also incorporate a variety of landscaping features.
507. External amenity areas incorporating landscaping features would be created at upper levels of the western elevation (the terrace 'spine') for the use of the office staff. A publicly access outdoor roof garden would be created at level 35. Landscaping on the roof terraces has been embedded in their design to help reduce the wind at those levels. The application accompanies a Landscaping Strategy (Landscape Statement, July 2024) which illustrates the vision of the landscape within the development. It is noted that the updated CFD assessment submitted in October to reflect on the design updates of the proposed scheme, does not assess terraces. RWDI considers that the design changes were very minor and have no material impact on terrace level wind conditions. On that basis, RWDI considers that the landscaping and wind mitigations embedded into the design of the proposed terraces, mentioned below, will continue to be effective.
508. According to the ES methodology a comparison of the measured wind environment for the proposed development with the existing conditions does not take into account any change in pedestrian activity from the baseline scenario to the proposed development with existing surroundings. Comparisons between the baseline scenario and 'completed development' scenarios have therefore been made where pedestrian activity is the same in the baseline and with the proposed development in place.



### Demolition and Construction effects

509. A quantitative assessment of the impacts during demolition and construction has not been undertaken. This is because demolition and construction activities are a temporary condition and would be highly variable as the proposed development is constructed. Wind conditions do not fully develop until external cladding is installed on the buildings. This means that conditions will continually change as massing is removed and added and effects will be temporary and variable. The wind conditions experienced around the baseline will gradually develop into those experienced around the completed proposed development, as the facades are built up to their final form. Conditions during construction can therefore be assumed to be between the two ranges, with the worst case developing once the facades on the proposed development are installed, and before landscaping is in place. The ES notes that the impact of large construction machinery such as cranes and piling rigs are not considered in the assessment. Such machinery is temporary and is considered too slim or open to significantly impact wind conditions.
510. Based on the wind conditions in Configuration 1: Existing Baseline, it would be expected that during the demolition and construction phase of the proposed development in the context of existing surroundings, wind conditions on site would be suitable for a working construction site.

### Configuration 2a: Proposed development without Mitigation

511. In Configuration 2a, the wind tunnel assessments have been tested without additional mitigation measures to the proposals. A small increase in wind conditions is seen along Gracechurch and Fenchurch streets compared to Configuration 1: Existing Baseline.
512. At ground level, all entrances on-site record acceptable walking wind conditions at both winter and summer seasons. Gracechurch and Fenchurch Street receptors would see an increase in wind conditions with many locations now recording occasional sitting and standing conditions at both seasons compared to Configuration 1 where more instances of frequent and occasional sitting conditions were recorded. The CFD assessment reported similar wind conditions for most locations, which range from suitable frequent sitting to walking during the windiest season. These remain similar in the updated CFD results submitted in October which reflect the amended design of the building. An increase by one category of the wind conditions to the southwest along Gracechurch Street was recorded in the CFD, from occasional sitting to standing conditions in the windiest season. However, this remains an acceptable wind condition for the intended uses. The area north and east of the 20 Fenchurch Street tower, where the wind tunnel data imply slightly windier

conditions, was the only place at ground level where the CFD and wind tunnel results disagreed. The ES explains that this area is behind of a number of tall towers and the flow conditions here are highly turbulent and therefore the wind tunnel testing offers a more accurate prediction of the wind conditions compared to the CFD analysis.

513. Measurement locations 50, 89 and 116 (locations mentioned in Configuration 1) improve from walking to standing and occasional sitting conditions in the worst-case compared to Configuration 1 which notes a Moderate Beneficial (Significant) effect. Measurement locations 46, 76 and 93 (locations mentioned in Configuration 1) remain at walking conditions from Configuration 1 which is a category above entrances limit, however this represents Negligible (Not Significant) effect.
514. It is noted that all remaining locations at ground level will face wind conditions acceptable for the indented pedestrian and cycling uses.
515. The proposed Undercroft records frequent sitting conditions at both worst-case and summer times. During summer season the Undercroft and most upper level terraces and the podium record acceptable frequent sitting to occasional sitting conditions, which are acceptable conditions for their indented use. One location at level 34 terrace and 5 locations of level 35 terrace receive tolerable standing conditions. The CFD analysis mainly aligns with the findings of the private terraces, however it records a walking condition to the northwest part of level 35 and a smaller part at the immediate below terrace.
516. At worst-case, the higher impacts are found at level 35 terrace with walking conditions at the north west part (measurement locations 339-340-341) of the terrace and a location that exceeds the safety limits (measurement location 341) which is at the northwestern part. The lower terraces record occasional sitting conditions with the exception of a standing condition recorded for one location (northwestern part) at the podium level (measurement location 325). The CFD analysis mainly aligns with these findings, however records a mixture of occasional sitting and standing conditions along the western terraces and the podium level with the instance of a walking condition at the northwestern part of the podium. The CFD analysis also found more instances of walking conditions and safety limit exceedances at levels 34 and 35 compared to the wind tunnel testing. These are located at the northern edges of the terraces with larger areas of impact at level 35, as well as at the southern parts of both terraces, however, these are less effected. It is highlighted that these conditions occur without the addition of mitigation measures.
517. The proposed terraces do not incorporate areas of long-term sitting and their indented use is to provide an outdoor area for users of the building and the

public in one instance, to walk around noticing the views, taking pictures and a breath of fresh air. Therefore tolerable conditions of standing are considered to be acceptable for the indented use and represent Negligible (Not Significant) effect according to the ES. Officers agree with this approach, however, wherever possible preferable conditions should be sought for the intended use if possible through design led approaches and mitigation measures.

518. For ease of reference, below is a figure extract from the ES (Figure 9.12 of Chapter 9) showing the worst-case and summer season wind conditions and pedestrian safety limits for the proposed development as assessed for this configuration.

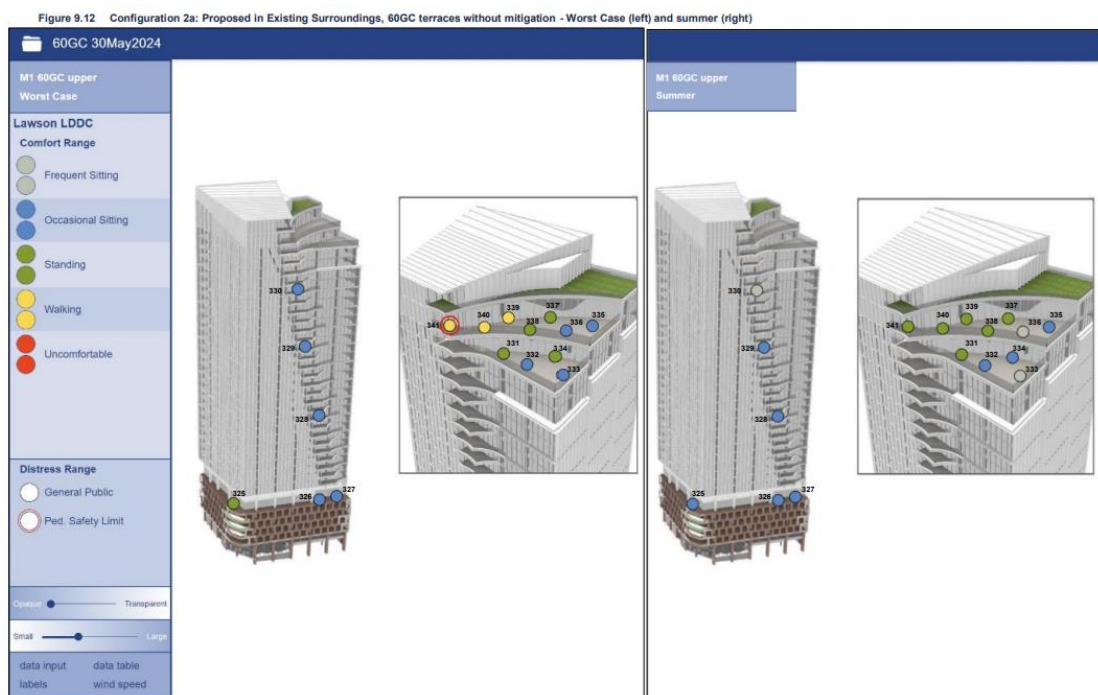


Figure 2. Configuration 2a comfort and distress range during summer (worst-case left)

519. Similarly, the below figure is an extract from the CFD assessment (Figures 11 and 12) showing the windiest and summer season comfort categories for the uppermost terraces of the proposed development for this configuration.

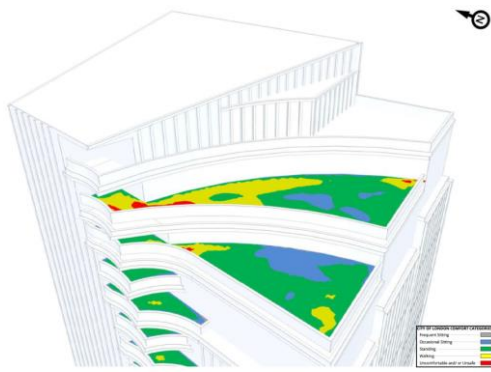


Figure 11: Configuration 2 – Proposed Development with Existing Surrounding Buildings, Proposed and Existing Landscaping – Terraces and Balconies, Windiest Season

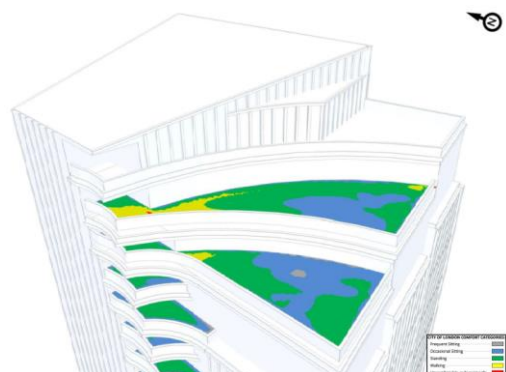


Figure 12: Configuration 2 – Proposed Development with Existing Surrounding Buildings, Proposed and Existing Landscaping – Terraces and Balconies, Summer Season

Figure 3. CFD Configuration 2 comfort range uppermost terraces - windiest season to the left and summer season to the right

**Configuration 2b: Proposed development with Mitigation**

- 520. Configuration 2b analyses the same scenario as Configuration 2a and adds mitigation measures where impacts were identified.
- 521. No additional mitigation measures are required at ground level and the upper level terraces as no unacceptable impact has been identified in Configuration 2a for these locations. The upper terraces at the west elevation would incorporate carefully designed balustrades and landscaping to be strategically placed and achieve sheltered and shaded areas for the users.
- 522. As mentioned above, all locations were suitable for the intended use expect for levels 34 and 35 terraces. Embedded and additional mitigation measures have been considered in this scenario during the wind tunnel testing. The additional mitigation measures comprise of: a layered continuous balustrade design along the roof terraces on levels 34 and 35, consisting of a porous section starting at floor level and ending at 1.25m, and a solid section starting at 1.25m above floor level and ending at 2.5m; and a solid screen at the northwest corner of the level 35 public terrace. The screen at level 35 is expected to be further developed at detailed design stage and this would be secured under condition.
- 523. In summer season, measurement locations 332 (centre-south of level 34 terrace) - 336 (south of level 35 terrace) will continue to record acceptable frequent to occasional sitting. Measurement locations 337-338 (centre-south of level 35 terrace) with the mitigation measures in place would record occasional sitting which is suitable for the intended use of the terrace. Measurement locations 339-340 (north of level 35 terrace) will continue to record tolerable standing conditions in the summer.

524. Measurement location 341 (the northwestern part of level 35 terrace) in the worst-case, now improves from exceeding the pedestrian safety limit in Configuration 2a to no safety exceedance in Configuration 2b, with wind conditions recording frequent sitting. Safety and wind conditions at this location are now considered to be acceptable. In the instance of standing conditions (measurement locations 340 and 337-338) and walking condition (measurement location 339 only in windiest season) the landscaping strategy would need to be updated in order to mitigate these conditions, and ensure seating areas are located in the most comfortable locations suitable for occasional seating, and that the roof garden entrances are able to withstand the wind conditions, and enable the terrace to be usable throughout the year. The landscaping strategy would be secured by condition where more details would be assessed at later stage and should take into consideration the wind microclimate conditions.
525. The CFD assessment report makes reference to the wind tunnel assessment which addresses the safety exceedances and walking conditions at the uppermost terraces through wind mitigation screens at a satisfactory level. The analysis does not show the results after the addition of the mitigation measures.

### **Configuration 3: Future/Cumulative Baseline – Tier 1**

526. In Configuration 3, the wind tunnel assessment incorporates Tier 1 cumulative schemes that fall within the study area (450m radius from the centre of the site) as listed above with the existing site in place. With the introduction of the cumulative schemes some off-site receptors have been added or changed sensitively from Configuration 2(a and b). These are mentioned in the table at the beginning of this section of the report.
527. The CFD analysis reports this scenario as Configuration 4 in the July submission, which is the last scenario tested in the assessment. As noted at the beginning of the section, the updated CFD assessment submitted in October, omits the cumulative scheme 55 Gracechurch Street as its planning permission (20/00671/FULEIA) expired in September 2024 and the approved development was not implemented by that time. The cumulative scheme therefore does not form a material consideration in the assessment of this application anymore.
528. At this and the following configurations, the report will breakdown the different locations of assessment to ground level, upper level for the proposed (following configurations only) and cumulative developments.

### **Ground Level**

529. At ground level, the wind tunnel testing for the existing site recorded wind conditions ranging from frequent sitting to occasional sitting in the summer and up to standing (only one location at the north footway of Gracechurch Street) in the windiest season which is considered to be acceptable for their intended use. The CFD analysis, records two locations at Gracechurch Street that are one category windier in the windiest season compared to the Existing Baseline (Configuration 1). A large area from the south of the site towards the southern junction and Eastcheap, and a smaller area immediately north of the intersection with Fenchurch Street now record standing conditions as opposed to occasional sitting conditions recorded without Tier 1 schemes for these locations. Occasional sitting and areas of standing conditions are recorded to the south and east of the site within the same block, which are windier conditions compared to records of frequent sitting conditions in these locations at the Existing Baseline.
530. Wind conditions for the surrounding ground level locations show an improvement to measurement locations 93 (only in summer), 50, 89 (in worst-case), and 116 (both seasons) (entrances mentioned at Configuration 1) compared to Configuration 1 recording standing conditions or better in the windiest season, which is acceptable for these locations. During summer wind conditions increase at measurement locations 136 (external café on Lime St Passage), 168-170 (section of Ship Tavern Passage in front of the Swan Tavern) from frequent sitting to occasional sitting, however, these are still considered to be acceptable conditions for their intended use. The CFD does not make such a detail analysis for these locations.
531. Unacceptable wind conditions have been recorded at measurement locations 46 (southwest entrance to Sky Garden from Philpot Lane), 76 (west entrance at 10 Plantation Lane, Rood Lane) (both identified in Configuration 1), and 287 (entrance of 40 Gracechurch Street) with walking conditions in the windiest season.
532. The wind tunnels tests did not record any pedestrian safety exceedances at the ground level neither did the CFD other than those identified in Configurations 1 and 2 which retain safety exceedances only in slightly reduced areas after Tier 1 schemes are implemented.

#### Upper Level – Cumulative Schemes

533. For Configuration 3, the upper levels at the cumulative schemes would show the wind conditions and safety limits as they would exist when these developments would be finished with the existing site in place. Measurement locations of the wind tunnel testing include the terrace at 55 Gracechurch Street (297-301), the podium and the roof top at 70 Gracechurch Street (302-308 and

319-323 respectively). For ease of reference, the measurement locations for the cumulative schemes are shown on the following figure which forms an extract from the ES (Figure 9.21 of Chapter 9).



Figure 4. Configuration 3 Baseline Cumulative Surroundings (Tier 1)

- 534. At 70 Gracechurch Street podium level wind conditions record acceptable frequent sitting to standing in the summer. Standing to walking conditions are recorded in the worst-case. At roof top level wind conditions record acceptable occasional to standing in the summer and in the worst-case. The CFD assessment also records results of the windiest season that show increased areas of walking conditions along the roof top of No. 70 compared to the summer season. Within some of the walking areas, the CFD also records areas of safety exceedances.
- 535. As noted above, at the time of this report, the planning permission approving the development at 55 Gracechurch Street lapsed and the development did not commence. Therefore, the approved scheme at No. 55 is not considered to be material consideration for this application anymore.

**Configuration 4: Proposed development with mitigation – Tier 1**

- 536. In Configuration 4, the effects of the proposed development to the Tier 1 cumulative schemes would be discussed. For ease of reference, the figure below is extracted from the ES (Figure 9.17 of Chapter 9) and shows the ground



level measurement locations for the Tier 1 and 2 (same locations for Configurations 4, 5 and 6).

Figure 9.17 Plan showing locations of probes and target thresholds in Configuration 4 and 6

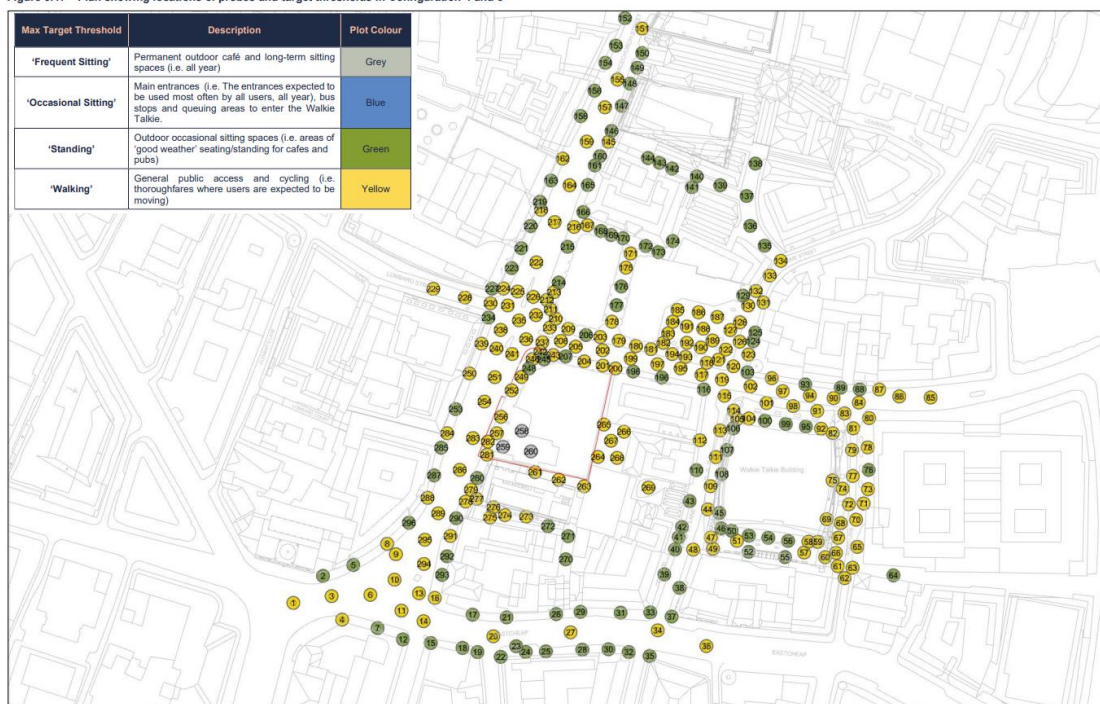


Figure 5. Configurations 4, 5 and 6 Measurement Locations

537. The CFD assessment recorded similar wind conditions ranging from suitable for frequent sitting to standing use wind conditions during the windiest season. Although there were calmer circumstances at ground level of the wind tunnel testing, the CFD models picked up more windy conditions on the terraces of the cumulative schemes. However, as mentioned previously the wind tunnel testing offers a more accurate representation of the wind conditions at these locations.

### Ground Level

538. At ground level, the wind tunnel testing for the proposed development locations recorded wind conditions ranging from frequent sitting to standing in the summer and up to walking (only one location at the western point of the footway at Fenchurch Street) in the windiest season which is considered to be acceptable for their intended use.

539. Wind conditions for the surrounding ground level locations are generally acceptable for their intended use. There would be no permanent outdoor café or long term meeting spaces with the introduction of the cumulative schemes at ground level and therefore the focus of the assessment is to effects on entrances and areas of general public access and cycling. The ground floor



locations at north Ship Tavern Passage (shop/café seating), Lime Street and Bulls Head, and the south of Talbot Court (section of Talbot Court in front of the Ship pub) (measurement locations 137, 173, and 271-272 respectively), would see a drop in comfort category from frequent to occasional sitting in the summer season compared to Configuration 3, however these conditions are still acceptable for the indented future use of these areas. Conditions of measurement locations 169-170 would also drop a category to standing, however these are tolerable and form a Negligible Effect (Not Significant). There is only one measurement location 296 (entrance to 41 Gracechurch Street) where conditions worsen from acceptable standing conditions or better in the previous configurations to walking conditions in the worst case (one category above the limit for entries), indicating a Major Adverse (Significant) effect. Comfort conditions at this location are record at 6.5m/s only 0.5m/s above the limit and only at winter season with acceptable conditions at all other seasons. The ES states that in this case the effect would be acceptable due to the season limitation and the nature of this entrance being secondary to the commercial unit with the main entrance expected to be used more frequently, which achieves acceptable standing conditions at all times.

540. In the CFD assessment, at ground level, the addition of Tier 1 cumulative schemes shows a drop of one category in wind conditions to the south-west nearby 55 Gracechurch Street with areas of walking conditions during the windiest season. With the omission of the previously approved development at 55 Gracechurch Street, permission which has lapsed, the wind conditions at this location improve to standing. Elsewhere the conditions would remain similar to those reported in Configuration 2. It is noted that the ground level locations of the proposed development would have suitable wind conditions for their intended use which aligns with the wind tunnel testing results.
541. The wind tunnels tests did not record any pedestrian safety exceedances at the ground level. The CFD assessment aligns with this outcome, as it only identifies the same areas as in the Existing Baseline.
542. For avoidance of any doubt, the remaining ground level measurement locations do not exceed the safety limits or the wind conditions for their indented use and therefore are considered to be acceptable.

Upper Levels – proposed development

543. For ease of reference, the following figure (Figure 9.25 of the ES of Chapter 9) is provided that shows the wind tunnel results for the proposed development.

Figure 9.25 Configuration 4: Proposed Development in Future Tier 1 Cumulative Surroundings, Proposed 60GC Terraces with mitigation - Worst Case (left) and summer (right)

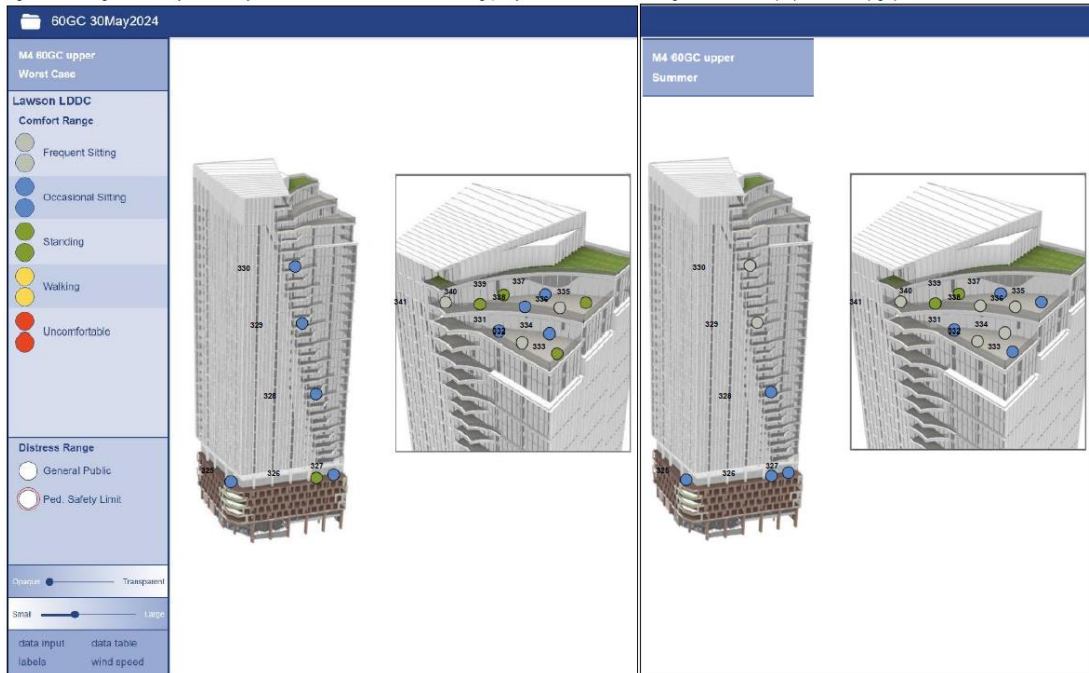


Figure 6. Configuration 4 Proposed Development in Future Baseline Cumulative Surroundings (Tier 1)

544. The lower level terraces, the podium and the uppermost terraces would see wind conditions ranging from frequent sitting to standing in both summer and windiest seasons. These conditions are considered to be acceptable for their intended use.
545. The CFD analysis largely agrees with the above results, however, it identifies walking conditions towards the northern edge of the uppermost terraces. Safety exceedances are also recorded at this location at level 35 terrace. Mitigation measures would be necessary at this location to meet the required comfort criteria for the intended use of the terrace as also identified in Configuration 2. The wind tunnel assessment has incorporated wind screens at these locations which after implemented would achieve suitable conditions and no safety exceedances as mentioned above.
546. It is noted that the wind conditions at the uppermost terraces would be slightly calmer in some locations with the inclusion of Tier 1 schemes in the assessment in comparison to Configuration 2b (proposed development with mitigation in existing surroundings).

Upper Levels – cumulative schemes

547. The podium level and the roof top at 70 Gracechurch Street (measurement locations 302-308) would record acceptable occasional sitting to standing

conditions in the summer. The CFD assessment records an isolated area of walking conditions at the roof terrace. This analysis however concludes that without the proposed development the conditions at these levels would be windier and therefore no mitigation would be necessary.

548. Safety exceedances are recorded at the terrace of 70 Gracechurch Street in the CFD assessment. It is highlighted that with the proposed development in place these exceedances are reduced. It should also be noted that the updated design of No.70 submitted during the assessment of this application, do not materially change these results.
549. These findings are not considered to be material anymore for the areas at No. 55 as explained above.

### **Configuration 5: Future/Cumulative Baseline – Tier 1 & Tier 2**

550. In Configuration 5, the conditions around the existing site and the Tier 1 and 2 surroundings will be discussed. The CFD, as discussed at the beginning of this section, did not undertake assessment for the Tier 2 cumulative schemes because these buildings did not have an effect on the results.

#### **Ground Level**

551. At ground level, the conditions of the existing site with the introduction of Tier 1 and 2 surroundings record acceptable wind conditions with a range of frequent and occasional sitting during both seasons and up to an isolated walking location at the western edge of the pavements at Fenchurch Street during the windiest time.
552. Whilst all other ground level locations record acceptable levels including the cumulative schemes, measurement locations at entrances 50, 76, 93 and 87 (these are mentioned previously in this section) record unacceptable levels of walking conditions in the windiest season. However, this is not different from Configuration 3 which indicates no changes with the addition of the Tier 2 schemes.
553. There are no instances of pedestrian safety exceedances at ground level.

#### **Upper Levels – cumulative schemes**

554. The wind conditions during the summer season for the outdoor amenity spaces at 70 Gracechurch Street are considered to have acceptable conditions ranging from frequent sitting to standing conditions. At the worst-case scenario the podium level of No. 70 record two locations with walking conditions.

555. An application (ref: 24/00825/FULEIA) to amend the existing consented scheme at 70 Gracechurch Street was submitted after the submission of this application. The addendum ES Chapter states that the changes to the existing scheme are minor and are not expected to significantly change the wind conditions from those recorded with cumulative surroundings (Configurations 5 and 6) and effects are expected to remain the same.

**Configuration 6: Proposed development with mitigation – Tier 1 & Tier 2**

556. In Configuration 6, most of the effects to the receptors remain the same as those in Configuration 4 (proposed development with Tier 1).

**Ground level**

557. At ground level, conditions at measurement location 81 (northwest of Rood Lane) improves from walking in Configuration 4 to standing in the worst-case.
558. Conditions at measurement locations 76, 93, and 287 continue to record walking conditions in the worst case, one category higher than the limit for entrances.
559. The conditions on-site remain the same between Configurations 4 and 6.

**Upper Levels – proposed development**

560. Conditions remain the same between Configurations 4 and 6 for the upper level terraces in the summer. In worst-case, there is only one measurement location (332 at outer edge of level 34 terrace) where wind conditions increase by one category from frequent sitting in Configuration 4 to occasional sitting in Configuration 6, which remains in acceptable limits.

**Upper Levels – cumulative schemes**

561. Tier 2 schemes would introduce some additional walking conditions at the podium level of 70 Gracechurch Street however this is not connected with the proposed development. All conditions would remain the same as in Configuration 4.

**Conclusions of wind microclimate**

562. In terms of the safety, the introduction of the proposed development within the baseline or future baseline scenario does not result in any additional safety exceedances at ground level nor worsen any existing exceedances in the surrounds of the site.

563. No significant effects are concluded as a result of the proposed development in isolation.
564. The uppermost terraces, at level 34 and 35 recorded the windiest conditions in the assessments with one location at the northern edge of the public terrace exceeding the safety limits in the windiest season. To mitigate that, the proposed development would incorporate additional mitigation measures which would include a layered continuous balustrade design along the roof terraces of level 34 and 35 and solid screen at the northwest corner of level 35. Configurations 2b and 4 in the wind tunnel test, show the results after additional mitigation measures were added and the results show acceptable conditions for the intended use.
565. In Configuration 2b (proposed development with mitigation), there was one instance, measurement location 339, where one of the two entrances to the terrace records walking conditions in the winter even after mitigation measures are incorporated in the wind tunnel testing. This is one category above the limit for entrances and represents a Major Adverse (Significant) effect. It is highlighted that comfort conditions at this location are recorded as 6.7m/s (with the limit being 6.0m/s), only 0.7m/s above the limit and below the limit conditions at all other seasons. It is also noted that a second entrance would be provided (measurement location 337), with standing conditions recorded in the worst-case scenario which are acceptable for its intended use. Subject to conditions recommended for a detailed landscaping strategy, balustrade and entrances taking into consideration the wind microclimate conditions and wind mitigation measures, in addition to the proposed location of a second entrance to the terrace achieving acceptable wind conditions all year round, it is considered that the adverse effect identified would be acceptable.
566. With the introduction of the cumulative schemes, some additional significant effects would arise as a result. In Configuration 4 (proposed development in Tier 1 cumulative surroundings), measurement location 296 would face a Major Adverse (Significant) effect in the windiest season only. As explained above this location forms a secondary entrance to the restaurant and the wind conditions are recorded at 0.5m/s above the limit whereas conditions would be below the limit at all other seasons. Users are generally expected to use the main entrance of the commercial unit which achieves acceptable conditions throughout the year.
567. Overall, the wind microclimate impact of the proposed development with proposed mitigation is considered to be acceptable. The proposed development has taken measures to mitigate any significant wind effects and appropriately address the existing local wind conditions.

568. A Wind Audit would be secured in the S.106 agreement which would require, if requested by the City Corporation, 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 ES. The wind conditions must be considered when designing the outdoor areas of the building and their access points to ensure the areas are well design to maximise their usability thought the year. Conditions have been recommended to secure this.
569. 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 emerging City Plan policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

### **Daylight Sunlight and Overshadowing**

570. 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.
571. 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.
572. Emerging City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby other sensitive receptors, including open spaces, is appropriate for its context and provides acceptable standards taking account of the Building Research Establishment's guidelines.
573. 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 emerging City Plan 2040 states when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.
574. 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 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 but are considered less important. The BRE Guide states that diffuse daylight of an existing buildings 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 kitchen and bedrooms to be less important, but care should be taken to not block too much sun from these rooms.

#### Interpreting results

575. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is proportionally a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-29.9% it is judged to be minor adverse, 30-39.9% 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

576. Overshadowing of amenity spaces is measured using transient overshadowing (TOS) and 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

577. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken by GIA in accordance with the BRE Guidelines and considered having regard to Policy D6 of the London Plan, Policy DM10.7 of the Local Plan 2015 and Policy DE7 of the emerging City Plan 2040. Part D of Policy D6 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 emerging 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.

578. The supporting text for Policy DE7 of the emerging City Plan 2040 goes on to state that developers will be required to submit daylight and sunlight assessments and undertake radiance studies in support of their proposals. A radiance-based Median Daylight Factor (MDF) daylight assessment has also been undertaken for the properties that would face the worst impacts from the proposed development. The MDF is part of calculation methods in BS EN17037 'Daylight in buildings'. BS EN17037 uses the MDF or median illuminance methods to assess daylight provision to proposed dwellings. Radiance uses a form of ray tracing to simulate the way in which light interacts with surfaces. As such, the MDF calculations depend on factors such as glazing transmissions and surface reflectances. However, it is noted that unless the internal and external surface reflectances used are sufficiently evidenced results would not be representative of the actual situation. Care should therefore be taken in the interpretation of the results presented in the updated 'Radiance Based Impact Assessment'.
579. The buildings (incl. residential, mixed use, religious, hotels) to be considered are:
- 50 Cornhill;
  - 2-4 Bulls Head Passage;
  - St Michael Cornhill Church;
  - St Peter Upon Cornhill Church;
  - The Bunch Of Grapes-14 Lime Street;
  - 7-12 Gracechurch Street;
  - The Ship - 11 Talbot Court;
  - 11 Eastcheap;
  - 9 Eastcheap;
  - 4 Brabant Court;
  - 5 Philpot Lane;



- 2-3 Philpot Lane;
- St Edmund The King Church;
- Jamaica Buildings;
- St Clements Church;
- St Margaret Pattens Church; and
- 1-4 Botolph Alley.

580. The amenity areas to be considered are:

- 2 Philpot Lane – Courtyard 1;
- 2 Philpot Lane – Courtyard 2;
- 31-32 Lombard Street – Roof Terrace;
- St Edmund the King Church – Amenity Area;
- George Yard – Amenity Area;
- Church of St Michael’s Cornhill – Amenity Area;
- St Peter-upon-Cornhill – Amenity Area;
- 85-87 Gracechurch Street – Terrace Area 1;
- 85-87 Gracechurch Street – Terrace Area 2;
- 2-4 Bulls Head Passage – Rooftop Amenity;
- 15-18 Lime Street – Roof Terrace 1;
- 15-18 Lime Street – Roof Terrace 2;
- 15-18 Lime Street – Roof Terrace 3;
- 15-18 Lime Street – Roof Terrace 4;
- 8-13 Lime Street – Roof Terrace; and
- Leadenhall Market.

581. The following scenarios have been assessed:

- Existing Baseline;
- Proposed development in Existing Baseline;
- Proposed development in Cumulative Surroundings (Tier 1); and
- Future Baseline.

582. The cumulative schemes assessed in the last two scenarios include the planning applications: 85 Gracechurch Street (22/01155/FULEIA); 25-26 Lime Street (18/00970/FULMAJ); 150-152 Fenchurch Street (22/00297/FULL); 50 Fenchurch Street (23/00069/NMA); 130 Fenchurch Street (19/00713/FULMAJ); 70 Gracechurch Street (24/00825/FULEIA).

583. It should be noted that following amendments to the design of the proposed scheme primarily relating to a step in approach of the southwest façade as explained further above in the report, an addendum of Chapter 8 (Daylight, Sunlight, Overshadowing, Solar Glare & Light Trespass, Volume 1) of the ES was submitted in October for consultation. The new submission updated the 70 Gracechurch Street scheme with the new application submitted for the site, rather than the consented scheme at the same site (20/00816/FULEIA), which has been included in the Tier 1 cumulative scenario and Future Baseline context. Similarly, and as explained further above in the report, at the time of the proposed amendments to the application site, the previous consent at 55 Gracechurch Street, site adjoining to the south and east, lapsed and has therefore been omitted from the cumulative schemes.
584. The closest Tier 2 scheme is 1 Undershaft, which is approximately 350m northeast of the site. Due to the built up nature of the existing surrounding context and the location of the Tier 2 cumulative schemes in relation to the site, no additional cumulative effects are anticipated for daylight, sunlight and overshadowing beyond those assessed quantitatively from the Cumulative Tier 1 scenario. Therefore, a separate Cumulative Tier 2 technical assessment is not required.
585. When referring to the degree of impact (negligible, minor, moderate etc.) in this report, officers have adopted the terminology used in the Environmental Statement when describing the degree or extent of adverse impacts. Officers agree with these judgements reached in the Environmental Statement and daylight/sunlight review when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in the BRE Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the Environmental Statement in forming a judgement on whether the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (Part D of London Plan Policy D6), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan Policy DM10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (emerging City Plan Policy DE7).
586. 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 non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding 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 daylight/sunlight test requirements as residential properties. The dense urban environment of the city in and around the Cluster is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight 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 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 in this respect.

*Daylight – existing baseline to proposed development*

587. Daylight has been assessed using both the Vertical Sky Component (VSC) and No Sky Line (NSL) tests these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assessed the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or NSL guidelines are not met.
588. The BRE criteria states that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experience a 20% or more reduction). In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).
589. Both the London Plan 2021 and emerging 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.
590. A total of 17 buildings have been considered as sensitive receptors and assessed in the baseline condition in relation to daylight sunlight:
- 50 Cornhill;
  - 2-4 Bulls Head Passage;
  - St Michael Cornhill Church;
  - St Peter Upon Cornhill Church;
  - The Bunch Of Grapes-14 Lime Street;

- 7-12 Gracechurch Street;
- The Ship - 11 Talbot Court;
- 11 Eastcheap;
- 9 Eastcheap;
- 4 Brabant Court;
- 5 Philpot Lane;
- 2-3 Philpot Lane;
- St Edmund The King Church;
- Jamaica Buildings;
- St Clements Church;
- St Margaret Pattens Church; and
- 1-4 Botolph Alley.

*Existing baseline condition*

591. For daylight in the baseline condition, of the 513 windows assessed for VSC, 24 (4.7%) would meet BRE's target of 27% VSC. Of the 210 rooms assessed for NSL, 59 (28.1%) would receive at 80% NSL.

*Proposed development*

592. Of the buildings assessed in the proposed baseline scenario, 12 would meet BRE's criteria for both VSC and NSL and considered to experience negligible (Not Significant) effect:

- 50 Cornhill;
- 2-4 Bulls Head Passage;
- St Michael Cornhill Church;
- St Peter Upon Cornhill;
- The Bunch of Grapes, 14 Lime Street;
- The Ship, 11 Talbot Court;
- 5 Philpot Lane;
- St Edmund the King Church;
- Jamaica Buildings;
- St Clements Church;
- St Margaret Pattens Church; and
- 1-4 Botolph Alley.

593. Of the 513 total windows assessed for VSC, 445 (86.7%) would meet BRE's criteria of meeting the 27% VSC target, or seeing reductions no greater than 20%. Of the 210 total rooms assessed for NSL, 187 (89%) would meet BRE's criteria of meeting the 80% NSL target, or seeing reductions no greater than 20%.

594. The assessment below focuses on those buildings with window/rooms that see a reduction in VSC and/or NSL in the proposed development.

*7-12 Gracechurch Street*

595. The property comprises nine-storeys with a public house at ground floor and hotel bedroom spaces at the upper levels. It is located 90m north of the proposed development.
596. A total of 128 windows were assessed for daylight.
597. For VSC, all windows would meet BRE's criteria, experiencing Negligible (Not Significant) effect.
598. For NSL, results show that 97 of the 98 (99%) rooms would meet BRE's criteria and 1 bedroom would see an alteration between 20-29.9% which is considered to be a Minor Adverse effect. The bedroom is located on the 7<sup>th</sup> floor (F07/R13) and experience low levels of NSL in the baseline scenario with 33.7%.
599. The BRE Guidance (2022) states that for dwellings the rooms that need to be assessed 'would include living rooms, dining rooms, and kitchens; bedrooms should also be analysed although they are 'less important'. While this property is a not a residential dwelling the premise of bedrooms being considered 'less important' to other more significant rooms is accepted here as well.
600. Overall, it is considered that there is high level of compliance with one isolated impact to a 'less important' bedroom and therefore the proposed development would have Negligible (Not Significant) effect on the daylight of the property.

*11 Eastcheap*

601. The property comprises six-storeys with commercial space at ground floor and residential at the upper levels. It is located 40m south of the proposed development. The site facing windows and bedrooms are located within a constrained courtyard and shaded by its own existing architectural form via projecting wings, which limits the amount of daylight availability in the baseline position.
602. A total of 18 windows serving 14 rooms were assessed for daylight.
603. For VSC, 8 would meet would meet BRE's criteria and 10 would see losses greater than recommended in BRE guidelines and would experience a reduction of 20% or more. Of the 10 affected windows, 9 are located adjacent to projecting wings which limit the amount of VSC in the baseline condition with

values between 6% - 19.5% which are below the recommended BRE criteria and are sensitive to further change. The remaining 1 window (W2/F05) serves a bedroom and experiences an alteration of 37.9% which constitutes Moderate Adverse effect.

604. For NSL, results show that 9 of the 14 rooms assessed would meet BRE's criteria. Of the 5 affected rooms, one would experience an alteration between 10-29.9% which constitutes minor adverse effect and 2 would experience an alteration between 10-39.9% which constitutes moderate adverse effect. The remaining 2 rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect.
605. It is considered that all 5 rooms affected in the NSL assessment, are bedrooms and are unable to meet an 80% target value in the baseline conditions. The absolute change ranges 1.5 - 2.4sqm and are 'less important' rooms.
606. Overall, it is considered that the effect of the proposed development on the daylight availability would be Moderate Adverse (Significant).

#### *9 Eastcheap*

607. The property comprises six-storeys with commercial space at ground floor and residential at the upper levels. It is located 40m south of the proposed development. The site facing windows and bedrooms are located within a constrained courtyard and shaded by its own existing architectural form via projecting wings, which limits the amount of daylight availability in the baseline position.
608. A total of 5 windows were assessed for daylight.
609. For VSC, 2 would meet BRE's criteria and 3 would see losses greater than recommended in BRE guidelines and would experience a reduction of 20% or more. Of the 3, 2 would be considered Minor Adverse and 1 would be Moderate Adverse. Similarly to the 11 Eastcheap, all three windows retain existing VSC values which falls short of the suggested 27% target outlined in the BRE guidelines and are sensitive to further change.
610. For NSL, results show that 4 of 5 rooms assessed satisfy the BRE guidelines and 1 bedroom would experience an alteration of Minor Adverse effect.
611. Overall, it is considered that the effect of the proposed development on the daylight availability would be Minor Adverse (Not Significant).

#### *4 Brabant Court*

612. The property comprises four-storeys and is in residential use. It is located 35m to the east of the proposed development. The site facing windows and rooms of the property face into a small courtyard receiving limited levels of daylight in the existing conditions.
613. A total of 17 windows were assessed for daylight.
614. For VSC, 5 would meet BRE's criteria and 12 would see losses greater than recommended in BRE guidelines and would experience a reduction of 20% or more. Of the 12, 6 would experience Minor Adverse effect and 6 would see Moderate Adverse effect. All 12 windows have existing daylight values far below the 27% recommended in the BRE guidelines. Due to the existing low VSC values, the resulting percentage change is disproportionate, as the absolute changes in VSC equate to less than 3.4% VSC for 4 windows and less than 3% for the remaining 8, which is unlikely to be a noticeable alteration.
615. For NSL, all rooms assessed satisfy the BRE guidelines.
616. Overall, it is considered that the effect on daylight for this property is Minor-to-Moderate Adverse (Significant).
617. It is noted that the building is included in the submitted Radiance Based Assessment. The results show low existing levels of 0.0-0.3% Median Daylight Factor (MDF) which would be reduced by 0.0-0.1% MDF. These are small changes, however represent up to 50% of the existing level. Given the very low existing of daylight levels this property receives any change at all is going to be proportionally large in percentage terms, but would not be noticeable.

### *2-3 Philpot Lane*

618. The property comprises seven-storeys of serviced apartments. It is located 15m east of the proposed development and has windows and rooms facing the site through a small courtyard which bounds the site.
619. A total of 49 windows were assessed for daylight.
620. For VSC, 6 would meet BRE's criteria and 43 would see losses greater than recommended in BRE guidelines and would experience a reduction of 20% or more. Of the 43, 4 would see Moderate Adverse effect and 39 would experience an alteration in excess of 40% which is considered a Major Adverse effect. All of the affected windows have existing daylight values far below the 27% recommended in the BRE guidelines. Due to the existing low VSC values, the resulting percentage change is disproportionate, as the absolute changes in VSC equate to less than 3.6% VSC for 17 windows, which is unlikely to be a

noticeable alteration. The remaining 26 windows see absolute changes of up to 11.2%.

621. For NSL, of the 18 rooms assessed, 2 would meet BRE's criteria. The results show that of the 16 affected rooms, 4 would see Moderate Adverse effect and 12 would experience an alteration in excess of 40% which is considered a Major Adverse effect. All affected rooms have baseline daylight values ranging from 0.6-34.8%, which is far below BRE's suggested target of 80%. It is understood that 5 rooms are studio apartments, 7 are living-kitchen-diners and 4 are bedrooms. BRE guidelines suggest that bedrooms are less sensitive compared to living rooms and dining rooms. As more than 20% of the working plane falls beyond the no sky line in each affected room, it is likely that supplementary lighting will be in use.
622. Overall, it is considered that the effect on daylight for this property is Major Adverse (Significant).
623. It is noted that the building is included in the submitted Radiance Based Assessment. The results show low existing levels of 0.0-0.5% MDF which would be reduced by 0.0-0.3% MDF. The assessment argues the some of the changes would not be perceptible to the users due to absolute loss of 0.1% and in the case of one room experiencing an absolute change of 0.3%, the existing value (0.5%) is far below the 14% target and the users would likely be reliant on supplementary lighting with or without the proposed development in situ. Any reduction to daylight at this property would not be noticeable, given the very low existing values close to zero.

#### Cumulative Daylight Impact

624. The same 17 properties were assessed for impact in the cumulative scenario, which incorporates the proposed development in Tier 1 schemes (the cumulative schemes have been updated in October's addendum submission as explained earlier in this section, with the assessment now considering 70 Gracechurch Street under the application submitted in 2024 instead of the previous consent, and 55 Gracechurch Street consented scheme now omitted due to its expiration). The ES Chapter 8 also includes an assessment of the future baseline (cumulative schemes without the proposed development) versus the future baseline with the proposed development. This and the results of the existing baseline versus the proposed development can be useful in determining the contribution of the proposed development in the cumulative loss.



625. Of the total 513 windows assessed for VSC, 343 (66.9%) would meet BRE's criteria. Of the 210 rooms assessed for NSL, 128 (61%) would meet BRE's criteria.
626. The assessment below focuses on the buildings with windows/rooms that see a reduction in the VSC and/or NSL as result on the cumulative development only.

#### *50 Cornhill*

627. The property comprises five-storeys of hotel/serviced apartments with public house at the ground floor. It is located 150m to the north of the proposed development.
628. A total of 10 windows were assessed for daylight that belong to hotel bedrooms.
629. For VSC, 9 windows would meet BRE's criteria and 1 would face a marginal short of the recommended 20% target and has Minor Adverse effect. This isolated window belongs to a bedroom which is served by one other mitigated window unaffected by the proposed development in Tier 1 schemes.
630. For NSL, 2 of the 7 windows assessed would meet BRE's criteria. Of the 5 affected windows, 4 would experience Minor Adverse effect and 1 Moderate Adverse effect. One window already fails to meet BRE's criteria in the baseline conditions. The affected windows are bedrooms which BRE guidelines suggests are less sensitive compared to living rooms and dining rooms.
631. Overall, given the marginal decrease in VSC target for one window and that four of rooms seeing NSL impacts are bedrooms, the effect is considered to be Minor Adverse (Not Significant) effect. It is also noted that this property remains BRE compliant in the proposed development in existing surroundings, and therefore the affected windows are an aftermath of the cumulative schemes predominantly. This is further demonstrated when compared to the future baseline, where the proposed development makes little difference to the daylight received at this property.

#### *2-4 Bulls Head Passage*

632. The property consists of four-storeys of commercial use at ground level and residential at the upper levels. It is located 90m north of the proposed development.
633. A total of 16 windows were assessed for daylight.

634. For VSC, 7 windows would meet BRE's criteria. Of the 9 affected, 8 would experience Minor Adverse effect and 1 Moderate Adverse effect. All of the affected windows have values that fall very short of BRE's criteria in the existing baseline conditions and therefore any meaningful massing in the site and surroundings would likely cause impacts to the property windows beyond the recommended 20% alteration.
635. For NSL, 7 of the 9 rooms assessed would meet BRE's criteria. Of the 2 affected rooms, both would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect. One room serves a bedroom which is considered as less sensitive in BRE's guidelines. Due to the constrained nature of this site, the available daylight to these rooms in the existing situation falls far short of the 80% target and therefore, any meaningful massing coming forward is likely to result in alterations beyond guidance.
636. Overall, the cumulative effect to daylight of this property is considered to be Minor Adverse (Not Significant). It is also noted that this property remains BRE compliant in the proposed development in existing surroundings, and therefore the affected windows are an aftermath of the cumulative schemes predominantly (primarily 70 Gracechurch Street). This is further demonstrated when compared to the future baseline, where the proposed development makes very little or no difference to the daylight received at this property.

*St Michael Cornhill Church*

637. The property is a religious building located approximately 150m north of the proposed development.
638. A total of 56 windows were assessed for daylight.
639. For VSC, 55 windows would meet BRE's criteria. One window would experience Major Adverse effect. In the baseline condition, this window retains a value of 7.4%, which is far short of the recommended 27% target and as such the resulting percentage change is disproportionate.
640. For NSL, all windows assessed would meet BRE's criteria.
641. Overall, given the disproportionate percentage changes due to the low existing values the cumulative effect to daylight of this property is considered to be Minor Adverse (Not Significant). It is also noted that this property remains BRE compliant in the proposed development in existing surroundings, and therefore the affected windows are an aftermath of the cumulative schemes predominantly. This is further demonstrated when compared to the future

baseline, where the proposed development makes very little or no difference to the daylight received at this property.

#### *St Peter Upon Cornhill Church*

642. The property is a religious building located approximately 150m north of the proposed development.
643. A total of 20 windows were assessed for daylight.
644. For VSC, 10 windows would meet BRE's criteria. Of the 10 affected, 5 would experience Minor Adverse effect and 1 Moderate Adverse effect. The remaining 4 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect. Each of the affected windows demonstrate baseline figures far below BRE's recommended 27% target and all 10 windows will experience an absolute change less than 3% which is unlikely to be a perceptible change. From all affected windows only one serves a different room and therefore the overall VSC of the room will not experience an alteration greater than 20%.
645. For NSL, 3 of the 4 rooms assessed would meet BRE's criteria. The affected room would experience an alteration of 20.5% which is considered a Minor Adverse effect and falls marginally short of the recommended 20% target.
646. Overall, given the disproportionate percentage changes due to the low existing values the cumulative effect to daylight of this property is considered to be Minor Adverse (Not Significant). It is also noted that this property remains BRE compliant in the proposed development in existing surroundings, and therefore the affected windows are an aftermath of the cumulative schemes predominantly. This is further demonstrated when compared to the future baseline, where the proposed development makes very little or no difference to the daylight received at this property.

#### *The Bunch of Grapes – 14 Lime Street*

647. A total of 11 windows were assessed for this property.
648. For VSC, 2 of the 11 windows would meet BRE's criteria. All 9 affected windows would experience Minor Adverse effect and 2 Moderate Adverse effect. Due to the existing low VSC values for all 9 affected windows, that fail to meet BRE's criteria, it is considered that any meaningful massing coming forward is likely to result in alterations beyond guidance. However, this impact is highly attributable to 70 Gracechurch Street and not to the proposed development.

649. For NSL, 3 of the 4 rooms assessed would meet BRE's criteria. The affected room would experience an alteration in NSL of 21.1% which is considered a Minor Adverse effect and is marginally greater than BRE's suggested 20% alteration.
650. Overall, given the disproportionate percentage changes due to the low existing values the cumulative effect to daylight of this property is considered to be Minor Adverse (Not Significant). When compared to the existing baseline, the proposed development makes a small difference to the daylight received. When compared to the future baseline the proposed development makes very little or no difference to the daylight received at this property and the view to the scheme from this existing building appears to be blocked by the scheme at 70 Gracechurch Street. The cumulative impact is therefore due to other schemes.

*7-12 Gracechurch Street*

651. A total of 128 windows serving 98 hotel rooms were assessed for daylight.
652. For VSC, 74 windows would meet BRE's criteria. Of the 54 affected windows, 4 would experience Minor Adverse effect and 1 Moderate Adverse effect. The remaining 49 would experience an alteration in excess of 40% which is considered a Major Adverse effect.
653. As this property is a hotel, all 54 impacted windows serve bedrooms, which can be considered as secondary spaces of less sensitive impact to daylight.
654. For NSL, 60 of the 98 rooms assessed would meet BRE's criteria. Of the 38 affected rooms, 15 would experience Minor Adverse effect, 17 would experience Moderate Adverse effect and 6 would experience Major Adverse effect. It is noted that all rooms belong to hotel bedrooms.
655. Overall, according to the ES the cumulative effect to daylight of this property is considered to be Moderate to Major Adverse (Significant). On this basis it is noted that the windows belong to hotel bedrooms which are secondary spaces less sensitive in respect of daylight, in addition to the lower daylight effects in the proposed development in existing surroundings which was Minor Adverse owing to one isolated impact to NSL. Thus, the impacts occurring to this property in this scenario are largely connected to the results of the cumulative schemes. It is therefore considered that although the proposed development makes small reductions in the daylight received at this property, it does not contribute to the cumulative impact. This is further demonstrated in the future baseline.

*11 Eastcheap*

656. A total of 18 windows serving 14 rooms were assessed for daylight.
657. For VSC, 4 of the 18 would meet BRE's criteria. Of the 14 affected windows, 4 would experience Minor Adverse effect and 10 would experience an alteration in excess of 40% which is considered to be Major Adverse effect. As discussed in the existing baseline, this property has windows and bedrooms located within a constrained courtyard and shaded by its own existing architectural form via projecting wings, which limits the amount of daylight availability.
658. For NSL, 5 of the 14 rooms assessed would meet BRE's criteria. Of the 9 affected rooms, 2 experience an alteration in NSL between 20-29.9% which is considered to be Minor Adverse effect and 2 would experience an alterations between 30-39.9% which is considered to be Moderate Adverse effect. The remaining 5 rooms, would see alterations greater than 40% which is considered a Major Adverse effect.
659. It is noted that the values and impact are improved compared to the initial assessments, due to the removal of the scheme at 55 Gracechurch Street.
660. Overall, the cumulative effect to daylight of this property is considered to be Moderate to Major Adverse (Significant). In the proposed development in existing surroundings, the identified effect was Moderate Adverse. An additional 4 windows and four rooms are impacted with the larger quantum of impacts being considered Major Adverse arising in the cumulative scenario, largely attributed to the broader massing of 70 Gracechurch Street compared to the slenderer nature of the proposed building. Therefore, the loss of daylight received at this property is caused by the proposed development at a significant level, but not in isolation.

### *9 Eastcheap*

661. A total of 5 windows serving 5 rooms were assessed for daylight.
662. For VSC, 2 of the 5 windows would meet BRE's criteria. Of the 3 affected windows, 2 would experience Moderate Adverse effect and the remaining 1 would see Major Adverse effect. Similar to 11 Eastcheap, the windows of the property also face the same constraints in daylight availability in the baseline conditions, due to their architectural nature.
663. For NSL, 2 rooms would meet BRE's criteria. Of the 3 affected rooms, 1 room would see alterations of Moderate Adverse effect and 2 rooms would see Major Adverse effect. All 3 affected rooms serve bedrooms which are secondary spaces, less sensitive in respect of daylight.

664. It is noted that the values and impact are improved compared to the initial assessments, due to the removal of the scheme at 55 Gracechurch Street.

665. Overall, the cumulative effect to daylight at this property is considered to be Moderate to Major Adverse (Significant). In the proposed development in existing surrounding, the effect of this property was identified as Minor Adverse. The ES considers that the decrease in daylight availability in the cumulative scenario at this property is largely caused by the updated scheme at 70 Gracechurch Street, as also concluded for the neighbouring property at 11 Eastcheap above. However, the proposed development would be a significant contributor to the loss of daylight at this property.

#### *4 Brabant Court*

666. A total of 17 windows serving 8 rooms were assessed for daylight.

667. For VSC, 2 windows would meet BRE's criteria. Of the 15 affected, 1 would experience Moderate Adverse effect and the remaining 14 would experience an alteration in excess of the 40% and is considered a Major Adverse effect. The windows of this property are facing an internal courtyard which limits the amount of daylight availability in the existing baseline conditions. Due to the existing low VSC values, the resulting percentage change is disproportionate and thereby it is considered that any meaningful massing coming forward is likely to result in alterations beyond guidance.

668. For NSL, none of the 8 rooms assessed would meet BRE's criteria. Of the 8 affected rooms, 6 would experience Minor Adverse effect and 2 would experience Moderate Adverse effect.

669. Overall, the cumulative effect to daylight at this property is considered to be Moderate to Major Adverse (Significant). The impact would be up to Minor to Moderate Adverse in the proposed development in existing surroundings. The ES argues that that the larger magnitude of impacts to this property is a result of the cumulative schemes. The results of the future baseline suggest that the proposed development would still be a significant contributor in the cumulative loss of daylight.

#### *5 Philpot Lane*

670. The property comprises five-storeys and it is understood to form part of Philpot House hotel (including 2-3 Philpot Lane).

671. A total of 12 windows serving 4 rooms were assessed for daylight.

672. For VSC, 11 windows would meet BRE's criteria. The affected window would experience an alteration of 21.9% which is considered Minor Adverse effect, just marginally above the BRE target and has an absolute change of 0.7% which is unlikely to be a perceptible change. It is noted that the window serves a studio which is also served by 2 other unaffected windows.
673. For NSL, all rooms assessed would meet BRE's criteria.
674. Overall, the cumulative effect to daylight at this property is considered to be Negligible (Not Significant). It is also noted that this property remains BRE compliant in the proposed development in existing surroundings, and therefore the affected windows are an aftermath of the cumulative schemes predominantly. This is further demonstrated when compared to the future baseline, where the proposed development makes little difference to the daylight received at this property.

#### *2-3 Philpot Lane*

675. A total of 49 windows were assessed for daylight.
676. For VSC, 6 windows would meet BRE's criteria. Of the 43 affected 4 would experience Moderate Adverse effect and 39 would experience an alteration in excess of 40% which is considered a Major Adverse effect. The overall results are similar to the proposed development in existing surroundings which resulted in Major Adverse effect.
677. For NSL, 2 of the 18 rooms assessed would meet BRE's criteria. Of the 16 affected rooms, 4 would experience Moderate Adverse effect whilst the remaining 12 would experience an alteration greater than 40% which is considered a Major Adverse effect.
678. There would be substantial losses in daylight.
679. Overall, the cumulative effect to daylight at this property is considered to be Major Adverse (Significant) which aligns with the results in the proposed development in existing surroundings. The proposed development is the primary factor in the loss of light.

#### *St Edmund The King Church*

680. A total of 28 windows were assessed for daylight.
681. For VSC, all windows would meet BRE's criteria.

682. For NSL, only one room would be affected, experiencing marginal levels below the recommended daylight distribution. The room serves a study and has low existing values of 23.1%.
683. Overall, the cumulative effect to daylight at this property is considered to be Minor Adverse (Not Significant). It is also noted that this property remains BRE compliant in the proposed development in existing surroundings, and therefore the affected room forms an aftermath of the cumulative schemes solely. This is further demonstrated when compared to the future baseline, where the proposed development makes no difference to the daylight received at this property.

#### *Jamaica Buildings*

684. The property comprises four-storeys of mixed uses of commercial and residential. It is located 140m northeast of the proposed development. The site facing windows of the property face within a small courtyard which is heavily constrained by its neighbouring buildings and thereby daylight levels of the property are limited in the existing conditions.
685. A total of 59 windows serving 9 rooms were assessed for daylight.
686. For VSC, 49 windows would meet BRE's criteria. Of the 10 affected windows, 9 would experience changes of Minor Adverse effect and 1 would experience Major Adverse effect. As explained above, due to the existing low VSC values, the resulting percentage change is disproportionate and thereby it is considered that any meaningful massing coming forward is likely to result in alterations beyond guidance. All affected windows fail to meet BRE's targets of 27% in the baseline condition.
687. For NSL, all windows assessed would meet BRE's criteria.
688. Overall, the cumulative effect to daylight at this property is considered to be Minor Adverse (Not Significant). It is also noted that this property remains BRE compliant in the proposed development in existing surroundings, and therefore the affected room forms an aftermath of the cumulative schemes predominantly. This is further demonstrated when compared to the future baseline, where the proposed development makes very little or no difference to the daylight received at this property.

#### *Sunlight – existing baseline to proposed development*

##### *Existing baseline condition*



689. In the existing baseline, 15 buildings were assessed for Annual PSH. Of the 306 windows, 61 (19.9%) would meet the criteria of BRE guidelines for receiving 25% APSH, of which 5% is in winter, in during the winter months (WPSH).

*Proposed development*

690. Of the buildings assessed in the proposed scenario, the following 12 buildings were assessed as experiencing a Negligible (Not Significant) effect within the BRE guidelines:

- 50 Cornhill;
- 2-4 Bulls Head Passage;
- St Michael Cornhill Church;
- St Peter Upon Cornhill Church;
- The Ship, 11 Talbot Court;
- 11 Eastcheap;
- 4 Brabant Court;
- 5 Philpot Lane;
- 2-3 Philpot Lane;
- Jamaica Buildings;
- St Clements Church; and
- St Margaret Pattens Church.

691. Of the total 306 windows assessed for APSH and WPSH, 281 (91.8%) would meet the BRE criteria or would experience little to no impact (less than 20% alteration).

692. The assessment below focuses on those buildings with windows that would see a reduction in APSH and/or WPSH in the proposed development.

*The Bunch Of Grapes, 14 Lime Street*

693. The property consists of five-storeys and is used as a public house at least at ground level with the understanding that the upper levels are in residential use.

694. A total of 10 windows were assessed for sunlight of which 1 would meet BRE's criteria for both APSH and WPSH.

695. For APSH, 7 windows would meet BRE's criteria for which are considered to experience a Negligible effect. The remaining 3 windows will experience an alteration between 23.8%-26.3% which is considered a Minor Adverse effect.

696. For WPSH, 4 out of 10 windows would not meet BRE's criteria. 2 windows will see alterations between 20-29.9% which is considered a Minor Adverse effect and the remaining four would experience alterations greater than 40% which is considered a Major Adverse Effect.
697. For the 2 windows that see Minor Adverse effects, given that the low baseline values falling short of the 5% target and an absolute change of just 1% in WSPH, it is considered that the percentage alterations are disproportionate to what the occupants would be likely to experience. The remaining 4 windows experience effects of a Major Adverse nature will also see a 1% absolute change from the baseline conditions. It is noted that all 6 windows will retain good levels of annual sunlight that either meet or exceed BRE guidelines.
698. Overall, the effect to sunlight at this property is considered Moderate Adverse (Significant).

*7-12 Gracechurch Street*

699. A total of 119 windows were assessed for sunlight, of which 104 (87.4%) would meet BRE's criteria for both APSH and WPSH.
700. For APSH, 2 windows will see losses between 21.4-23.1% which is considered a Minor Adverse effect and falls marginally above the BRE's recommended 20% target.
701. For WPSH, 15 windows see losses greater than 40% which is considered a Major Adverse effect. Of the 15 windows, 11 would meet BRE's criteria for annual sunlight and the remaining 4 would retain annual sunlight values between 20% and 24%.
702. All windows that experience impact are bedrooms which are less sensitive in sunlight receipt.
703. Overall, the effect to sunlight at this property is considered Moderate Adverse (Significant).

*St Edmund The King Church*

704. This is a religious property located over 100m northwest of the proposed development.
705. A total of 18 windows were assessed for sunlight, of which 17 (94.4%) would meet the BRE's criteria for both APSH and WPSH.

706. For both annual and winter PSH, 17 windows would meet BRE's criteria and the remaining window will see a loss of 22.7% in annual sunlight and 25% in winter sunlight which is considered a Minor Adverse effect. This window serves the main hall which has multiple mitigating windows that are not affected by the proposed development. The room would therefore retain 35% and 5% for annual and winter values respectively and is considered as Negligible effect (Not Significant).

#### Cumulative Sunlight Impact

707. Within the 15 buildings assessed for sunlight, of the 306 windows, 194 (63.4%) would meet the criteria of BRE guidelines for receiving 25% APSH, of which 5% is in winter, in during the winter months (WPSH).

708. Of the buildings assessed in the cumulative scenario, the following 7 buildings were assessed as experiencing a Negligible (Not Significant) effect within the BRE guidelines:

- The Ship, 11 Talbot Court;
- 11 Eastcheap;
- 4 Brabant Court;
- 5 Philpot Lane;
- 2-3 Philpot Lane;
- St Clements Church; and
- St Margaret Pattens Church.

709. The assessment below focuses on the remaining 8 buildings with windows that would see a reduction in APSH and/or WPSH in the cumulative scenario.

#### *50 Cornhill*

710. A total of 10 windows were assessed for sunlight, of which 9 (90%) would meet BRE's criteria for both APSH and WPSH.

711. For APSH, 8 windows would meet BRE's criteria. One affected window would experience loss of 26.3% which is considered to be Minor Adverse effect. The remaining window will see a loss of 22.6% which is also considered to be Minor Adverse effect. It is noted that that this window will retain APSH value of 24%, which falls marginally short of the 25% target as suggested in the BRE guidelines.

712. For WPSH, 9 windows would meet BRE's criteria. The affected window would face 100% loss of sunlight which is considered Major Adverse effect. It is

however highlighted that in the existing conditions the window only achieves 1% in sunlight availability which falls very short of the recommend 5%.

713. Overall, since the BRE loss of sunlight guidelines primary apply to living rooms and conservatories, it is considered that the cumulative effect to sunlight at this property is Minor Adverse (Not Significant). It is also noted that this property remains BRE compliant in the proposed development in existing surroundings, and therefore the affected room forms an aftermath of the cumulative schemes predominantly. This is further demonstrated when compared to the future baseline.

#### *2-4 Bulls Head Passage*

714. A total of 16 windows were assessed for sunlight, of which 8 (50%) would meet BRE's criteria.
715. For APSH, 8 windows would see losses of Minor and Moderate effects.
716. For WSPH, all windows would meet BRE's criteria.
717. Overall, the cumulative effect to sunlight at this property is considered to be Moderate Adverse (Significant). It is also noted that this property remains BRE compliant in the proposed development in existing surroundings, and therefore the affected room forms an aftermath of the cumulative schemes alone (particularly 70 Gracechurch Street). This is further demonstrated when compared to the future baseline, where the proposed development makes no difference to the sunlight received at this property.

#### *St Michael Cornhill Church*

718. A total of 35 windows were assessed for sunlight, of which 31 (88.6%) would meet BRE's criteria.
719. For APSH, 2 windows would experience Minor Adverse effect.
720. For WPSH, 1 window would experience Minor Adverse effect and 1 Major Adverse with losses greater than 40%.
721. The ES states that all affected windows serve the main religious hall and therefore when considering the overall APSH of the hall it would meet BRE's criteria.
722. Overall, the cumulative effect to sunlight at this property is considered to be Minor Adverse (Not Significant). It is also noted that this property remains BRE

compliant in the proposed development in existing surroundings, and therefore the affected room forms an aftermath of the cumulative schemes alone. This is further demonstrated when compared to the future baseline, where the proposed development makes no difference to the sunlight received at this property.

*St Peter Upon Cornhill Church*

- 723. A total of 15 windows were assessed for sunlight, of which 7 (46.7%) would meet BRE's criteria.
- 724. For APSH, 3 windows would experience Minor Adverse effect and 5 windows would experience an alteration greater than 40% which is considered a Major Adverse effect.
- 725. For WPSH, 6 windows would experience a Major Adverse effect.
- 726. Overall, the cumulative effect to sunlight at this property is considered to be Moderate to Major (Significant). It is also noted that this property remains BRE compliant in the proposed development in existing surroundings, and therefore the affected room forms an aftermath of the cumulative schemes alone. This is further demonstrated when compared to the future baseline, where the proposed development makes no difference to the sunlight received at this property.

*The Bunch Of Grapes-14 Lime Street*

- 727. A total of 10 windows were assessed for sunlight, of which 1 (10%) would meet BRE's criteria.
- 728. For APSH, 9 windows would experience losses greater than 40% which is considered a Major Adverse effect.
- 729. For WPSH, 6 windows would be affected of which 2 would experience Minor Adverse effect and the remaining 4 would see losses greater than 40% which is considered a Major Adverse effect.
- 730. Overall, the cumulative effect to sunlight at this property is considered to be Major Adverse (Significant). In the proposed development in existing surroundings scenario the impact was assessed as Moderate Adverse. An additional 6 windows are impacted annually with all 9 impacts now considered Major Adverse. When compared to the future baseline the proposed development makes no difference to the sunlight received as the scheme at 70 Gracechurch Street blocks the view to the proposal. It is therefore considered

that the larger magnitude of the impact is attributable to 70 Gracechurch Street. It should be noted that if 70 Gracechurch Street does not progress the proposed development would impact sunlight to this property.

#### *7 – 12 Gracechurch Street*

- 731. A total of 199 windows were assessed for sunlight, of which 52 (43.7%) would meet BRE's criteria.
- 732. For APSH, 66 windows would be below the annual probable sunlight hours guidelines experiencing impacts between Minor and Major Adverse effects.
- 733. For WPSH, 62 windows would be below the winter probable sunlight hours guidelines experiencing impacts of Major Adverse effect.
- 734. As mentioned earlier in this section, this property serves as a hotel and it is less sensitive to losses of sunlight in the context of BRE guidelines.
- 735. Overall, the cumulative effect to sunlight at this property is considered to be Major Adverse (Significant). In the proposed development in existing surroundings scenario the impact was assessed as Moderate Adverse. These results and those of the future baseline vs proposal do suggest that the proposed development does contribute to the loss of sunlight, but not in isolation.

#### *St Edmund the King Church*

- 736. A total of 18 windows were assessed for sunlight, of which 17 (94.4%) would meet BRE's criteria.
- 737. For APSH, 1 window would experience a loss of 22.7% which is considered a Minor Adverse effect.
- 738. For WPSH, 1 window would experience an alteration of 25% which is considered a Minor Adverse effect.
- 739. Overall, based on the room served by other unaffected windows, it is considered that the property would meet the guidelines overall, and therefore the cumulative effect to sunlight at this property is considered to be Negligible (Not Significant).

#### *Jamaica Buildings*

740. A total of 33 windows were assessed for sunlight, of which 20 (60.6%) would meet BRE's criteria.
741. For APSH, 13 windows would be below the annual probable sunlight hours guidelines experiencing impacts between Minor and Major Adverse effects.
742. For WPSH, 7 windows would see losses greater than 40% which is considered a Major Adverse effect.
743. Overall, the cumulative effect to sunlight at this property is considered to be Moderate to Major Adverse (Significant). It is also noted that this property remains BRE compliant in the proposed development in existing surroundings, and therefore the affected room forms an aftermath of the cumulative schemes alone (predominately 70 Gracechurch Street). This is further demonstrated when compared to the future baseline, where the proposed development makes no difference to the sunlight received at this property.

#### Conclusion on Daylight and Sunlight Impact

744. Overall, whilst there are some impacts in excess of BRE guidance, due to the context of the individual properties assessed it is not considered that the proposal would result in any unacceptable impacts and is therefore in compliance with Local Plan Policy DM10.7, London Plan Policy D6(d), and emerging City Plan Policy DE8.

#### Transient Overshadowing

745. The BRE guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify the different times of the day and year when shadow would be cast over a surrounding area. The guidelines recommend that for an external space to appear well lit at least 50% of the area should receive at least 2 hours of sunlight on March 21st. If as a result of development an amenity area does not meet the above and the area which receives two hours of direct sunlight is reduced to less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.
746. In relation to overshadowing, all areas of public open space, such as parks, squares, neighbouring communal areas and private gardens, are considered highly sensitive.
747. The potential overshadowing impacts of the proposed development has been assessed on 16 surrounding public amenity areas:

- 2 Philpot Lane – Courtyard 1;
- 2 Philpot Lane – Courtyard 2;
- 31-32 Lombard Street – Roof Terrace;
- St Edmund the King Church – Amenity Area;
- George Yard – Amenity Area;
- Church of St Michael's Cornhill – Amenity Area;
- St Peter-upon-Cornhill – Amenity Area;
- 85-87 Gracechurch Street – Terrace Area 1;
- 85-87 Gracechurch Street – Terrace Area 2;
- 2-4 Bulls Head Passage – Rooftop Amenity;
- 15-18 Lime Street – Roof Terrace 1;
- 15-18 Lime Street – Roof Terrace 2;
- 15-18 Lime Street – Roof Terrace 3;
- 15-18 Lime Street – Roof Terrace 4;
- 8-13 Lime Street – Roof Terrace; and
- Leadenhall Market.

748. In addition, three podium areas and three terraces within the consented 70 Gracechurch Street cumulative scheme, which are north of the site and therefore sensitive to overshadowing, have been assessed in the cumulative scenario.

*Existing baseline to proposed development*

749. All of the areas except one would meet BRE's criteria for loss of sunlight, when the existing baseline results are compared to the proposed development.

750. The affected space related to 15-18 Lime Street (roof terrace 3) and would be below the guidelines as the area able to receive at least two hours of sunlight on 21 March would be less than half the total area and reduced by 57%, compared to the guideline 20%. It is considered that the effect of proposed development to this area would be Major Adverse. At the time of this assessment it is not clear whether this area serves as an accessible roof area, and if it does not then it would be considered there would be no effect. It should be noted that, the results in 21<sup>st</sup> June demonstrate that this area would see more than six hours of direct sunlight and therefore, should this area comprise sensitive uses, it could still be utilised as such and enjoy sunshine throughout the year.

*Cumulative Impact*

751. In the cumulative scenario 3 areas would be below BRE's criteria. These areas relate to the 2-4 Bulls Head Passage rooftop amenity, and 15-18 Lime Street



(roof terrace 3 and 4). All three areas would experience impacts of Major Adverse effect, due to large proportional losses of the areas able to receive at least two hours of sunlight on 21<sup>st</sup> March.

752. It is noted that 70 Gracechurch Street is between the proposed development and these areas it is this scheme that is predominately responsible for the loss.
753. In terms of the outdoor amenity spaces in 70 Gracechurch Street scheme, two areas of the building would be below the BRE guidelines. A podium terrace (podium 2) is assessed as a Major Adverse loss of sunlight and a terrace (terrace 1) is assessed as a Moderate Adverse loss of sunlight. It should be noted that the terraces remain well sunlit and therefore users of this building would continue to have access to well sunlit spaces.

#### Conclusion on Transient Overshadowing

754. In conclusion, the results show that there would be no material overshadowing effects caused by the development to any public amenity area and therefore the proposal complies with, Policy D6 of the London Plan, DM10.7 of the Local Plan and DE7 of the emerging City Plan 2040.

#### **Solar Glare**

755. Glare is the discomfort or impairment of vision caused by excessive or large contrast in luminance within the observer's field of view and can occur when sunlight is reflected from a glazed façade. There are two categories of glare: distracting glare (excessive brightness of surfaces or luminaires within the field of view that cause discomfort) and disability glare (presence of a high illuminance source within a low luminance scene which impairs vision).
756. For discomfort glare, the key issue is the total duration for which the sun can be reflected to the sensitive location. Duration of less than 50 hours per year are unlikely to cause serious problems, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun usually presents the most problems), whether shading devices are already in use, and the way the space is used.
757. It is noted that Solar Glare is not a comparative assessment, so the assessment considered the effect of the proposed development in absolute terms.
758. 62 locations have been identified in the ES as sensitive to solar glare. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions and pedestrian crossings at these locations. The potential

effect on train drivers and their view of train signals has also been considered and therefore viewpoints along nearby railway lines have been assessed as sensitive receptors.

759. The proposed development is not considered to be visible from 41 viewpoints.
760. The assessment concludes that the proposed development would have Minor Adverse effect at 10 locations, based on the potential reflections within 20° to 30° of line of sight. At 3 locations it identifies Minor Adverse effect, based on the potential reflections within 10° to 20° of line of sight. These are the worst-case points.
761. Overall, the potential impact of solar glare from the proposed development is considered at it worse to be Minor Adverse but the effects are not significant. The assessment concludes that no additional measures are required to mitigate the impact of solar glare.
762. If planning permission were to be granted, a S.106 obligation would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of a mitigation measures (if considered necessary). The proposed development would comply with Policy D9 of the London Plan, Local Plan Policy DM10.1 and emerging City Plan 2040 Policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

### **Light Trespass**

763. Local Plan Policy DM15.7 and emerging City Plan Policy DE8, requires that development incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
764. Potential light pollution impacts arising from the proposed development have been assessed in relation to 6 buildings, of short and long term residential accommodation, which have been identified within a 30 metres radius from the office elements of the proposed development as sensitive to the impacts of light pollution in accordance with Institute of Lighting Practitioners (ILP) Guidance.
765. The assessment shows that pre-curfew (before 11pm), the levels of light pollution would be limited and well within the 25-lux threshold set out within the ILP Guidance for all 6 surrounding buildings assessed.

766. The post-curfew (after 11pm) assessment shows that the levels of light trespass would be below the 5-lux threshold set out within ILP Guidance at all buildings assessed and therefore experience a Negligible (Not Significant) effect.
767. The assessment states it is based on a typical internal lighting design of 500 lux across the working plane and therefore does not reflect the final lighting design. The assessment does not include any external lighting. Any further assessment at a detailed design stage should include any proposed external lighting, in addition to the proposed internal lighting as well as other factors and assumptions used in the calculations such as external surface reflectances used.
768. A condition has been included which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would 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 in line with City's Lighting SPD.
769. Subject to the satisfaction of this condition, the development would comply with Local Plan Policy DM 15.7 and emerging City Plan 2040 Policy DE8 and has been designed to avoid light spill.

### **Third Party Review**

770. Building Research Establishment (BRE) group were commissioned to undertake an independent review of daylight, sunlight, overshadowing and solar glare and the light trespass assessments as well as the radiance based assessment in terms of their scope, method of assessment, criteria used, and conclusions reached. BRE undertook a second review of the addendum chapter submitted in October.
771. The reviews concluded the scope of the assessment undertaken was appropriate.
772. In respect of the assessment methodology and assessment the reviews concluded the BRE were generally satisfied with the assessment methodology and that is in accordance with guidelines. There were only a few instances where BRE disagreed with the overall effect the ES attributed to some properties in the proposed development and cumulative scenarios. BRE also highlighted that when room layouts have been assumed, less weight should be applied as they may be less accurate. Where multiple windows light the same area of a room the BRE report suggests that an additional calculation of the

weighted average (by glazing area) of the values could be used to inform the results for the room as a whole. Results per room are included with individual values in Addendum Annex 4 of the submitted ES. Although the area weighted assessment is not specifically referenced, BRE assumed the values follow the correct method. This calculation is only suitable where windows light the same part of the space. For large rooms with windows more than 5m apart the calculation should not be used.

773. In terms of the scale of impact, BRE largely agrees with the ES based on the percentage alteration, however adds that extra care should be given if a window with a larger loss is a secondary window where a primary window meets the guidelines, the overall loss to the room would be less than the individual results suggest. BRE has used this methodology and compared the results to those in the ES.
774. In regard to the daylight and sunlight to neighbouring properties, BRE agreed with the majority of the effects ascribed within the ES. The instances of disagreement and where additional comments of extra care have been provided are mentioned in the following paragraphs.

*Existing baseline to proposed development*

*4 Brabant Court and 2-3 Philpot Lane*

775. BRE finds the scale of impact identified in the ES reasonable and adds the following in relation to the radiance assessment undertaken for these properties:
776. “However, MDF assessments are not designed to analyse loss of light. Since these calculations also include internally and externally reflected light and the results depend on the layout of rooms, they are also dependent on the assumptions that have been made in this respect. A key aspect of this is surface reflectance, which dictates how reflected light from external surfaces enters a space and reflects within the space. Surface reflectances used are based on standard assumptions (designed for assessing proposed developments). Unless surface reflectances used have been evidenced with on-site measurements, the results cannot be fully representative of the actual situation.”

*St Edmund the King Church*

777. “The loss of daylight results presented suggest that the BRE guidelines would be met.

778. One window would be below the annual and winter probable sunlight hours guidelines. This window is on the south west facing front of the building. Relative losses of annual and winter sunlight would be 23-25%, compared to the guideline 20%. The Addendum Chapter states that the space this window lights is also lit by other windows and the space as a whole would meet the BRE guidelines with 35% annual probable sunlight hours with 5% in the winter (compared to the 25% annual and 5% winter targets). The Addendum Chapter therefore assesses a negligible impact, which is reasonable, unless the window, or area of the church it lights, has a specific requirement for sunlight, in which case the impact would tend to minor adverse.”
779. GIA was asked to respond to this point, and have advised that “the recommended targets for annual and winter sunlight are 25% and 5%, respectively. The retained values to the room in question either meets or exceeds these values with 35% and 5%. GIA do not agree that the effect would tend to minor adverse.”

### Cumulative Impact

#### *2-4 Bulls Head Passage*

780. “Nine windows out of the 16 assessed would be below the vertical sky component guidelines with relative losses in the range of 22-33%. Two rooms would also be below the daylight distribution guideline with relative losses of the area able to receive direct sky light of 25% and 27%, compared to the guideline 20%. The Addendum Chapter assesses a minor adverse cumulative impact to daylight. This is reasonable, but could tend to moderate adverse for worst-case areas. In-any-case the proposed development has very little, or no, influence on the loss of daylight as other cumulative schemes (primarily 70 Gracechurch Street) are responsible for the loss. The results are slightly better than those in the original Chapter.”
781. There is slight disagreement to the effect scale at the cumulative scenario of this property. However, since the proposed development has very little or no influence on the loss of daylight, either scale of impact would not need to be mitigated in the scheme.

#### *The Bunch of Grapes – 14 Lime Street*

782. “Nine of the eleven windows analysed would be below the vertical sky component guidelines with relative losses in the range of 22-27%. Rooms would meet the daylight distribution guideline. The results are a slight improvement compared to the original Chapter due to the use of the revised scheme at 70 Gracechurch Street. The Addendum Chapter still suggests a

minor adverse cumulative loss of daylight. This is generally reasonable but could tend to moderate adverse overall due to the high proportion of windows impacted. When compared to the existing baseline, the proposed development makes a small (within the BRE guidelines) difference to the daylight received. When compared to the future baseline the proposed development makes very little or no difference to the daylight received and the view to the scheme from this existing building appears to be blocked by the scheme at 70 Gracechurch Street. The cumulative impact is therefore due to other schemes.”

783. BRE notes that the cumulative loss of daylight to this property tends to moderate due to the high number of windows impacted, which is one category higher to the impact attributed within the ES. However, since the proposed development has very little or no influence on the loss of daylight, either scale of impact would not need to be mitigated in the scheme.

#### *7-12 Gracechurch Street*

784. “54 windows and 37 rooms would be below the BRE guidelines. There would be some substantial losses of daylight. The Addendum Chapter suggests a moderate to major adverse cumulative impact to daylight. We would suggest this would tend to major adverse based on the very large losses. This property is a hotel, where the loss of light may be considered less of an issue than domestic properties, unless the rooms were used for long term occupation. When the proposed development was compared to the existing baseline a minor adverse impact was assessed. When compared to the future baseline the proposed development does make some further reductions in daylight. Therefore, although the proposed development does contribute to the cumulative impact, the magnitude is predominately due to other schemes.”
785. BRE disagrees with the scale of impact to the daylight of this property being moderate to major and suggest this would tend to be major adverse based on the very large losses. However, since the cumulative impact is largely attributed to other schemes and there is no disagreement on the scale of impact at the existing baseline vs proposed development scenario for this property, this makes no difference to the overall assessment.

#### *4 Brabant Court*

786. “15 windows would be below the vertical sky component guidelines and eight rooms would be below the daylight distribution guidelines. There would be some substantial relative losses, up to 63% of existing vertical sky component and 36% of daylight distribution. The original Chapter assesses a major adverse cumulative impact to daylight, while the Addendum Chapter assesses a moderate to major adverse impact. Although one room would see an

improvement in its daylight distribution (but still be below the guideline) two others would be reduced to below the guideline and other values are generally similar to the original Chapter. We suggest the impact should therefore be major adverse. The impact would be up to moderate adverse when the proposed development is compared to the existing baseline. Results with the future baseline suggest the proposed development would still be a significant contributing factor in the cumulative loss of daylight.”

787. BRE disagreed with the scale of impact attributed to this property in terms of daylight losses and suggests it should be major adverse, which is slightly higher to the one identified in the ES. Either way there are no mitigation measures proposed to the minimise the impact.

#### *5 Philpot Lane*

788. “One window would be marginally below the vertical sky component guidelines. The Addendum Chapter suggests a negligible impact because the room would have two other windows which would be unimpacted. However, the window maps suggest the two other windows are to the front of the room, while the window below the guideline lights the rear. The front windows may not compensate for the loss of light if the windows are more than 5m apart and the impact would tend to minor adverse. The results suggest that the proposed development is predominately responsible for the loss of daylight to this window.”

789. The applicant has been asked to provide further information on the distances between the front and rear windows mentioned above to understand the overall cumulative impact to this property in terms of daylight. GIA response was “*These windows are not at opposite sides of the respective property as suggested. The window that experiences a minor effect in the cumulative scenario is north facing. The two mitigating windows are located on the eastern elevation and are less than five metres from one another*”.

#### Overshadowing

790. “As part of the cumulative assessment the Addendum Chapter also assess the impact of the proposed development on the scheme at 70 Gracechurch Street. The Addendum Chapter states that two area at the building would be below the BRE guidelines. A podium terrace (podium 2) is assessed as a major adverse loss of sunlight and a terrace (terrace 1) is assessed as a major adverse loss of sunlight. These are reasonable based on the potential losses of sunlight.
791. However, there may be a mistake in the relevant table in Annex 8.6 as results for another podium (podium 1) suggest a 40% reduction in sunlight, with the

area able to receive two hours of sunlight 48% of the space (compared to the guideline 50%). The table suggests no relative loss and this area is not discussed in the Addendum Chapter. If there is a loss of sunlight here as the figures suggest it would be assessed as at least minor adverse.”

792. The applicant was asked to clarify the above, and GIA responded as follows “GIA have reviewed and can see there is a formatting error. There would be 40% reduction in the FBvCumulative column. Whilst this technically equates to a Major Adverse loss, as the area retains 2+ hours of sun on March 21st to 48% of the area against BRE's target of 50%, the effect is considered to be negligible to minor adverse and remain not significant as per the submitted ES chapter”.

### **Thermal Comfort Assessment**

793. London Plan Policy D8 and D9 and Policies S8, S12 and S21 of the emerging City Plan 2040, 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, sun 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.
794. In accordance with 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 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.
795. 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.
796. Three configurations have been assessed including; the existing site with existing surrounding buildings, the proposed development with existing



surrounding buildings, and the proposed development with cumulative surroundings.

Usage Category	% of hours with Acceptable UTCI	Description	Colour (HTML Colour Code)
All Season	≥90% in each season	Appropriate for use year-round (e.g. parks).	Green (#378c4b)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).	Purple (#c86ebe)
Short-term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.	Cyan (#1effff)
Short-term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.	Orange (#fab92d)
Transient	<25% in winter OR <50% in any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).	Red (#de2d26)

Figure 7. Thermal Comfort Criteria (extract from CoL Thermal Comfort Guidelines 2020)

797. Four configurations have been assessed, including the existing site with the existing surrounding buildings, the proposed development with the existing surrounding buildings, the proposed development with the cumulative surroundings and the existing site with the cumulative surroundings.
798. The outdoor thermal comfort assessment identified the sensitive receptors at the ground level and the elevated areas of the proposed development and the cumulative schemes. At ground level, the receptors are entrances to buildings, spill-out spaces and general public amenity spaces. The acceptable thermal comfort categories for these receptors are set out as short-term or better for the entrances and all seasonal or seasonal for the spill-out and public amenity spaces depending on their intended use on a year-round basis. At elevated areas, short-term thermal comfort category has been considered as acceptable for terraces and balconies offering amenity spaces which are only suitable for a short duration/ infrequent sedentary use.
799. As noted in other sections above, the design of the proposed development was slightly amended and a submission pack was issued in October for re-consultation. A letter from RWDI accompanied the re-submission, which states that no further thermal comfort assessment is required following the updates to the scheme based on the results of the new CFD assessment of the amended proposed development. The updated CFD demonstrates there are minimal or

slightly improved wind conditions on the site and surroundings compared to the previous scheme and therefore it is expected that the outdoor thermal comfort assessment would either be the same or slightly improved as well. This is a reasonable approach, and the results discussed below only reflect the initial submission in July.

### **Configuration 1: Existing Baseline**

800. In the existing baseline scenario, in the seasons of spring, summer and autumn, the UTCI values stay within the acceptable range at least 70% of the time in all locations. During the winter, due to lower air temperatures and reduced solar radiation combined with higher wind speeds result in a great number of hours falling outside the acceptable range (between 50% and 80% of the time).
801. For the pedestrian realm immediately surrounding the site, most locations reported conditions which were acceptable for the majority (>90%) of the time from spring to autumn.
802. When looking at comfort, conditions at ground level were predominantly all season and seasonal in most locations. Short-term conditions were predicted around 20 Fenchurch Street, and further north along Gracechurch Street. At the existing site, the footway along Gracechurch Street is in all seasonal category whilst the footway along Fenchurch Street is a seasonal category.
803. For ease of reference, the figure below (extract from the Thermal Comfort Assessment prepared by RWDI, Figure 3) shows the Existing Baseline conditions.



Figure 8. Existing Baseline - Ground Level, Annual Thermal Comfort Conditions

**Configuration 2: Proposed development in existing surroundings**

- 804. The ground level pedestrian spaces in the vicinity of the proposed development are primarily transient spaces (i.e. pavements and cycle paths).
- 805. Conditions at the ground level of the proposed development would remain comfortable at least 90% of the time from spring through autumn with the area along Fenchurch Street being slightly more affected over these seasons.
- 806. In winter, localized shadowing cause by the project does create a reduction in predicted comfort levels to the north and north-east along the footways. Output from the assessment reported comfortable conditions at least 75% of the time in the majority of these locations.

807. In terms of the thermal comfort conditions in the proposed development, there would be alterations at the north of the site along Fenchurch Street and to the south along Gracechurch Street, now recording short-term areas. A small, isolated area of short-term seasonal conditions was predicted to the north nearby 1 Leadenhall. These areas of short-term comfort, however, would be suitable for their intended use which relates to thoroughfares, entrances, and bus stops.
808. All other locations at ground level would not see any significant changes to their thermal comfort conditions from the existing baseline to this configuration.
809. In terms of the outdoor elevated areas of the proposed development, the terraces of the west 'spine' were predicted to have acceptable seasonal use. The uppermost terraces at levels 34 and 35 (public terrace) were predicted to have an all season and seasonal use with smaller areas of short-term use in isolated locations of the northern edges. The short-term areas were also identified to have windier conditions during the wind tunnel testing and wind mitigation measures were introduced to bring more suitable wind conditions in these areas. The thermal comfort assessment has not incorporated the additional mitigation measures and therefore these area should record better thermal comfort conditions after the mitigation screen will be implemented. Large parts of these terraces would be suitable for outdoor sitting all year-round.

### **Configuration 3: Proposed development with Tier 1 Cumulative Schemes**

810. The Tier 1 cumulative schemes included in the thermal comfort assessment would be the same ones used for the wind microclimate assessments. These are mentioned at the previous section of this report. As in the CFD assessment, the thermal comfort assessment did not include Tier 2 schemes as these were deemed to be too far away from the site or not large enough to have meaningful impact on the wind or thermal comfort condition at the site.
811. In Configuration 3, there would be no alterations to the UTCI values in the summer but alternations would be seen in spring and autumn with these remaining within the acceptable range at least 80% of the time in all locations. Like, in Configurations 1 and 2, in Configuration 3, winter is the least comfortable season. Compared to Configuration 2 (proposed development in existing surroundings), here in some areas the number of acceptable hours is increased around the site along Gracechurch Street and towards the north to the intersection with Fenchurch Street as well as in surrounding locations, like along Lime Street and Pudding Lane. Some areas, mainly towards the south of the site, at the junction with A10 and along Eastcheap, would see a decrease in the acceptable hours compared to Configuration 2. These areas would also

see a change from the existing baseline scenario (Configuration 1) to this configuration.

812. In terms of thermal comfort conditions, at ground level It was anticipated that the implementation of Tier 1 cumulative schemes will increase the areas of short-term thermal comfort (i.e., have a negative impact) along Gracechurch Street north of the site and along Gracechurch Street to the southwest. However, it was anticipated that cumulative developments around 20 Fenchurch Street would have a positive effect. In general, it is anticipated that the thermal comfort levels will be suitable for the intended pedestrian activities.
813. In terms of thermal comfort conditions at the proposed outdoor elevated areas, these would be substantially comparable to those stated in Configuration 2, making it suitable for the use purposes for which they were intended.
814. An assessment was conducted about the conditions on the terraces located at 55 and 70 Gracechurch Street. For the intended uses, it was expected that both terraces would provide seasonal and all-season thermal comfort conditions. It should be noted that before the determination of this application, the consented scheme at No. 55 expired, and the development did not commence, and any effects to its areas should therefore not form a material consideration.

### **Configuration 3: Existing site with Tier 1 Cumulative Schemes**

815. In the absence of the proposed development, the UTCI values in the summer would remain the same as in the existing baseline (Configuration 1) whilst some alterations to the acceptable hours would be seen in spring and autumn, with increase of acceptable hours around the tower at 20 Fenchurch Street and northern and decrease in these hours, 90%, along Fenchurch Street to the west of the site and along Gracechurch Street towards the south junction. Like, in all other configurations, the winter is the worst season. There is slight decrease in the number of acceptable hours along Gracechurch Street from the site towards the south and some isolated location to the north, and similarly along Fenchurch to the west of the site with some slight improvement around the Walkie Talkie as seen in previous configurations. Compared to Configuration 3 (proposed development in cumulative schemes), the absence of the proposed development in the winter improves the UTCI values at 70 Gracechurch Street and slightly alterations, some marginal decrease, in the values of the terrace at 55 Gracechurch Street, however still remaining within the acceptable range at least 70% of the time in these locations.
816. In terms of thermal comfort, conditions north of the site along Fenchurch Street and south-west along Gracechurch Street would have marginally better thermal comfort than Configuration 3 in the absence of the proposed development.

However, along Gracechurch Street, there was supposed to be a zone of short-term seasonal circumstances that would not occur in Configuration 3. This would be acceptable because it would happen on the street. It was anticipated that, in other places, thermal comfort levels would resemble those in Configuration 3, which is appropriate for pedestrian uses.

817. Compared to Configuration 3, the terraces of 70 Gracechurch in Configuration 4 would see a slight decrease in thermal comfort condition in the absence of the proposed development, but still acceptable for the intended uses.
818. Thermal comfort conditions on the terraces of 55 Gracechurch Street were predicted to be materially similar to those reported in Configuration 3, and therefore considered acceptable for the intended uses.

### **Thermal Comfort Conclusion**

819. It is considered that the thermal comfort in and around the site would be acceptable and in accordance with London Plan Policy D8, Policy D9 and emerging City Plan 2040 policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

### **Contaminated Land**

820. Local Plan Policy DM15.8 and emerging City Plan 2040 Policy HL4 require developers to carry out detailed site investigations to establish whether a 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. Policy S1 of the emerging City Plan 2040 also expects developers to address land contamination. Paragraph 189 of the NPPF states the decisions should ensure sites are suitable for its proposed use taking account of ground conditions.
821. The Phase 1 Contamination Report submitted with the application assesses the impact of ground conditions associated with the proposed development. The report considers potential contamination sources, pathways, and receptors, focusing on the following risks:
  - Construction workers and site visitors: There is a low risk of exposure to potentially contaminated soil, dust, or fibres during excavation activities. This risk is associated with shallow excavation works (up to 800 mm for a new basement slab) and deeper works (up to 4 m) for a new structural core.

- Controlled waters: The risk of pollution to the Lambeth Group and Thanet Formation secondary aquifers is assessed as low to moderate, mainly through the potential creation of preferential pathways during piling operations. Piling could allow the vertical migration of contaminants if present.
  - Neighbouring properties: The potential for exposure to contaminated dust during demolition and construction is considered low, with risks to neighbouring users mitigated through typical site control measures.
822. The report concludes that the site has a low potential for significant contamination, and no identified potential contaminant linkages (PCLs) pose a risk during the operational phase of the development. The risk to human health (construction workers, site visitors, and neighbours) and to controlled waters during construction is considered low to moderate. An intrusive ground investigation is recommended to further assess these risks and inform piling operations and foundation design.
823. The City's Environmental Health Officer has reviewed the application and raises no objections, recommending a series of conditions, including:
- Site investigation and risk assessment: Prior to construction, a detailed investigation must be undertaken to establish if the site is contaminated and to assess the potential for pollution.
  - Remediation strategy: Where contamination is identified, a remediation scheme must be submitted and approved, ensuring the site is safe for the intended use.
  - Verification report: After remediation, a verification report must be submitted to confirm that the necessary works have been completed.
  - Unexpected contamination: Any contamination discovered during works must be reported, with further investigation and remediation carried out if necessary.
  - Demolition and construction environmental protection scheme: To mitigate the impact of dust and other environmental effects.
824. Thames Water have also requested a condition in respect of a piling method statement and piling layout plan.
825. The submitted contamination report and the conditions recommended by the Environmental Health Officer and Thames Water ensure that the proposed

development would comply with Local Plan Policy DM15.8, policies S1 and HL4 of the emerging City Plan 2040 and the NPPF. Subject to these conditions, the risks from contamination are considered manageable and acceptable.

## **Sustainability**

### **Circular Economy**

826. London Plan policy S17 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. Local Plan 2015 policies CS15 and DM 17.2 and emerging City Plan 2040 policies S16 and what set out the City's support for a Circular Economy and a Zero Waste City.
827. The existing building was constructed in 1996 as a single-tenant office with eight office floors. A refurbishment in 2010 added a lower ground floor. The existing building is comprised of two basement storeys and nine superstructure storeys (one ground floor, plus eight storeys).
828. Visual assessments concluded the building is in good structural condition for its age and use. With appropriate ongoing maintenance, the substructure and superstructure are likely to achieve 60+ years of additional design life.
829. The current basement was constructed within the footprint of a pre-existing single-storey basement on the site. The footprint of the L-2 basement differs from that of L-1 basement. The retaining walls are reinforced concrete ranging from 300-400mm. The basement is currently used for ancillary uses and the lower ground floor includes two retail units.
830. The frame is predominantly a post-tensioned concrete frame, although the upper two storeys were constructed from a steel frame with lightweight concrete slabs. The presence of post-tensioned floor slabs is a critical consideration for demolition of the floor slabs both in terms of demolition safety and the structural functionality of retained parts of the slab.
831. The façade is clad with a stick-form curtain system with double glazed units and pre-cast concrete panels on floor level and on the northern end of the eastern elevation. The double-glazed units and gasket and silicone seal are beyond a typical service life.
832. The vast majority of the MEP was installed during building construction and is at or near the end of its serviceable life. Ventilation, heating, and cooling provision would require extensive revision to support latest requirements to achieve compliance with current Building Regulations, Part L and Part F.



833. The current building has an EPC rating of D.

*Pre-redevelopment audit*

834. The pre-redevelopment audit and WLC optioneering assessment includes details of the optioneering process which addresses circular economy matters in this section, as well as whole life-cycle carbon matters in the whole life-cycle carbon section of this report. Optioneering has been conducted with a 'retrofit first' approach.

835. Nine redevelopment scenarios were identified across a spectrum of interventions from minor refurbishment to load-balanced extensions, and optimised developments. The options include:

- Scenario 1 – full retention of the existing structure and building envelope with MEP upgrade.
- Scenario 2 – full retention of the existing structure with upgrade to the façade and full replacement of internal finishes and MEP equipment.
- Scenario 3 – full retention of the existing structure with addition of floors above the existing structure achieving load balance with full replacement of internal finishes, façade and MEP equipment.
- Scenario 4 – deconstruction of top two floors and addition of 5 new floors to extend to the full floor plate while achieving load balance with full replacement of internal finishes, façade and MEP equipment.
- Scenario 5 – deconstruction of top two floors and addition of 22 floors, fill in atrium and full replacement of internal finishes, façade and MEP equipment. Construction of new concrete core. Existing core walls retained where suitable.
- Scenario 6 – as Scenario 5 but with additional deconstruction and structural works associated with demolition of all existing core walls.
- Scenario 7 – retention of substructure and addition of new superstructure totalling at 31 storeys with new internal finishes, façade and MEP equipment.
- Scenario 8 – retention of foundations and part of retaining wall, addition of 3rd basement level and addition of new superstructure totalling at 31 storeys with new internal finishes, façade and MEP equipment.

- Scenario 9 – new construction below and above ground level with 3 basement and 31 above-ground levels.
836. It was agreed that scenarios 1, 3, 6 would be omitted from the detailed optioneering assessment because:
- Scenario 1- the façade has little remaining service life and it wouldn't achieve the 2030 minimum energy efficiency standards expected to be introduced. Scenario 2 is considered to represent the minimum refurbishment requirements for an acceptable minimum energy efficiency upgrade.
  - Scenario 3 is similar to Scenario 4, but would be subject to strengthening challenges and lower NIA.
  - Scenario 6 is similar to Scenario 5 but would require extensive temporary works, to replace the existing core.
837. Therefore, of the nine identified scenarios, a detailed optioneering assessment was conducted on scenarios 2, 4, 5, 7, 8 and 9. The optioneering assessment determined that
- adaptation and disassembly of existing building elements is limited in scenarios 2, 4 and 5 as the building was not designed for disassembly and would be difficult to adapt. Extension opportunities on these scenarios are constrained by the existing building's grid and core location. Scenarios 2 and 4 were eliminated as they would be unable to meet development and densification aspirations on the site, as well as wider policy benefits such as urban greening and climate resilience initiatives, and public offer.
  - scenarios 7, 8 and 9 could be designed with considered grid spacing and core locations to ensure future adaptability, and the use of materials (steel planks and precast planks) to enable future disassembly. Scenarios 8 and 9 were eliminated as they require the highest level of intervention and therefore the highest carbon expenditure.
  - the additional investigation of scenarios 5 and 7 concluded that scenario 5 has limited flexibility within the retained areas and would result in an inefficient core, structural and MEP arrangements to support both the existing and new structure. It was concluded scenario 7 offers improved flexibility and an optimised core, structure and MEP which should enable greater future adaptability.

838. Following qualitative and quantitative analysis, Scenario 7 is proposed as preferred option, a new build option with 65% of substructure retention by mass. It's presented as the option that provides uniform, flexible, adaptable and high-quality office space that is not constrained by strengthened structural support (e.g. additional columns), and a flexible ground floor level that can improve the public realm.
839. The options analysis was carried out with a 'retrofit first' approach but concluded that retention of the existing building would not meet optimal sustainability and policy objectives for the site and its position in the City context.
840. The third-party review confirmed the pre-redevelopment audit and the options assessment meet the requirements of the GLA Circular Economy Statement Guidance and the City Corporation Carbon Options Guidance.

#### Circular economy statement

841. The submitted Circular Economy Statement describes the strategic approach, including the incorporation of circularity principles and actions into the proposed development, in accordance with the GLA Circular Economy Statement Guidance.
842. The pre-demolition audit predicts that a total of 19,229.9 tonnes of material would arise as a result of the proposed development. Key Demolition Products (KDPs) are estimated to comprise of 98.69% by weight of all waste on site. The four KDPs include:
- Inert materials – 15,998.6 tonnes, including:
    - Concrete / hardcore - 14,892.6 tonnes
    - Bricks / inert – 1,082.9 tonnes
    - Tiles and ceramics – 22.2 tonnes
    - Asphalt – 0.9 tonnes
  - Metals (structural buildings frames, doors and windows etc) - 2,472.3 tonnes, including:
    - Steel – 2,023.6 tonnes
    - Mixed metals – 448.7 tonnes

- Glass – 276.9 tonnes
  - Carpets, vinyl, flooring – 229 tonnes.
843. The pre-demolition audit notes that opportunities for reuse for some of the materials on-site are limited as the building has not been designed for disassembly, and glass is unlikely to meet current thermal or sounds insulation standards. Materials identified as suitable for reuse include stone façade cladding, ceiling panels and lights, internal doors, carpet tiles, raised access floors, structural steel, steel handrails, glass partitions and cable trays.
844. Circular economy project commitments are established in accordance with the GLA circular economy principles and building layers. Design commitments include, but are not limited to:
- Partial retention of existing retaining walls and pile foundations in the substructure, amounting to 20% retention by mass of the existing structure (substructure and superstructure).
  - Optimising material quantity and weight of substructure, including use of a piled raft, resulting in reduced piling and excavation.
  - Maximised use of modular and panellised material, e.g. a unitised façade system to standardised measurements.
  - Adaptable floorplates to allow reconfiguration and increase the lifespan of the building.
  - Underfloor Air Distribution (UFAD) system to minimise ductwork, piping, heat pumps which have high replacement cycles.
  - Cat A fit out to minimise scope for fittings/furniture installation requirements.
845. In addition to these commitments, a number of additional opportunities will be explored. Opportunities include, but are not limited to:
- Reuse of demolished concrete.
  - Sourcing reclaimed steel, providing sufficient supply at the time of procurement.
  - Enabling deconstruction of the superstructure without damage to the components, e.g. maximise bolted/demountable connections.

- Future design considers how elements and components are connected to enable future disassembly.
846. An update to the Circular Economy Statement including results from the detailed design phase and a post-completion update in line with the GLA guidance on Circular Economy Assessments to confirm that high aspirations can be achieved are required by condition.

### **Operational energy strategy and carbon emissions**

847. London Plan Policy SI 2 ('Minimising greenhouse gas emissions') requires major developments achieve a 35% on-site energy reduction beyond building regulations, through energy efficiency measures. The Energy Statement demonstrates that the proposed development has been designed to achieve an overall 29% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building. This is a slight reduction from the Energy Statement submitted in July 2024 where the proposed updates to the geometry of the building and additional south facing glazing would have an impact on the heating and cooling energy use of the building. The original submitted scheme was designed to achieve an overall 32% reduction in carbon emissions compared with Part L.
848. The following passive design measures are included in the design development to improve energy efficiency. They are expected to result in a 27% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building. This is currently considered to be a high level of energy efficiency (in the context of new City office development) that can be achieved through the arrangement of spaces within the building and the design of the corresponding facades maximising the reduction of winter heat loss and summer solar gain. In detail, the following measures are integrated:
- Optimised glazing design and locations to maximise daylight and minimise overheating. Balconies and terraces are integrated to limit excessive passive solar gains in summer and permit solar gain in winter.
  - High efficiency glazing with passive external shading to ensure an efficient balance between daylight and solar gain.
  - High thermal envelope performance.
849. The building is designed as a mechanically ventilated building that can be operated separately on each floor through an Underfloor Air Distribution (UFAD) system that connects to two Air Handling Units (AHUs) (per floor). The AHUs are ducted to intake and exhaust louvres on the façade (four louvres per

floor). Compared to alternative MEP systems, the proposed system is highly efficient for the proposed building type and provides significant energy savings during the winter and mid-seasons. There is access to an external balcony on each floor for the occupiers and the balcony doors can be opened for comfort ventilation.

850. A system of Photovoltaic (PV) panels and heat pumps is proposed as Low and Zero Carbon (LZC) technology solutions. 141 PV panels are proposed to create a screen above the plant on the roof. Air Source Heat Pumps (ASHP) at roof level would meet the space heating and hot water demand of the development. A Water Source Heat Pump (WSHP) is proposed at basement level to provide a boosted hot water system to service end of trip facilities. The proposed LZC technologies are estimated to result in a 2% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building.
851. The proposed development would receive electrical supplies from two different primary substations, providing a high level of resilience in the event of a power failure from one source. Therefore, there will be no diesel fired back-up generators required for emergency power.
852. There are no active or proposed heat networks in the immediate vicinity of the proposed development. A potential connection point to a future heat network would be provided in the basement. The Domestic Hot Water plantroom would be retrofitted for a future heat network connection.

### **Energy Use Intensity (EUI)**

853. The proposal has been assessed using a CIBSE (Chartered Institution of Building Services Engineers) TM54 (Technical Memorandum) compliant methodology to provide an assessment of regulated and non-regulated energy consumption. GLA energy assessment guidance (2022) requires applicants to report the EUI and space heating demand of the development and target an EUI of 55kWh/m<sup>2</sup>/year and a space heating demand of 15kWh/m<sup>2</sup>/year. The proposal's predicted EUI is 82.14 and space heating demand is 3.09 (kWh/m<sup>2</sup>/year) and would meet the UK Green Building Council's energy performance target for 2025-2030 (90 kWh/ m<sup>2</sup>/year, moving towards the 2030-2035 target of 70kWh/m<sup>2</sup>/year).
854. The London Plan (2021) and GLA energy assessment guidance (2022) states that carbon must be reduced by a minimum of 35% beyond Part L 2021. It is acknowledged that non-residential developments may find it challenging to achieve this target as the baseline included low carbon heating. The 29% reduction stipulated in the energy assessment is considered to be an excellent

achievement, exceeding other commercial developments in the City of London recently assessed.

855. A S.106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

### **Certifications**

856. The proposed development has been pre-assessed under BREEAM UK New Construction v6.1 - shell & core (office). The proposed development is targeting 'Outstanding' with a score of 91.8%. The pre-assessment is on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution, Materials and Waste.
857. The BREEAM pre-assessment results comply with Local Plan policy CS15 and emerging City Plan 2040 policy DE1. Post construction BREEAM assessments are requested by condition.
858. NABERS UK: This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. When signing up to this scheme, applicants commit to achieve target rating, in this case a 5.5 star rating (out of 6 possible) which will contribute to reducing common performance gaps between modelled and actual energy use intensity. A Design for Performance assessment will be carried out during RIBA stage 3.
859. The proposed development is targeting a Platinum WELL Standard. The WELL standard measures, certifies and monitors features of the built environment that impact human health and well-being, including air, water, nourishment, light, fitness, comfort and mind. Platinum certification is the highest certification.

### **Whole life-cycle carbon emissions**

#### **Carbon options**

860. Policy DE1 in the emerging City Plan 2040 introduces a retrofit first approach and requires carbon optioneering is conducted and used as a tool to explore opportunities to retain and retrofit existing buildings. Although the City Plan 2040 has not yet been adopted, it indicates a policy direction. The City Corporation's Carbon Options Guidance Planning Advice Note (PAN) supports

the NPPF (2023) which states in paragraph 157 that the planning system should support the transition to a low carbon future.

861. As presented in the circular economy section, nine redevelopment scenarios were identified across a spectrum of interventions. As agreed, optioneering was conducted on six scenarios, which included:

- Scenario 2: Light refurbishment, MEP & envelope update. Retained substructure – 100%. Retained superstructure – 100%.

16,051 sqm GIA

- Scenario 4: Refurbishment & minor extension. Retained substructure – 100%. Retained superstructure – 100%.

22,906 sqm GIA

- Scenario 5: Refurbishment & major extension. Retained substructure – 69%. Retained superstructure – 57%.

54,857 sqm GIA

- Scenario 7: Refurbishment & major extension. Retained substructure – 65%. Retained superstructure – 0%.

55,469 sqm GIA

- Scenario 8: Refurbishment & major extension. Retained substructure – 34%. Retained superstructure – 0%.

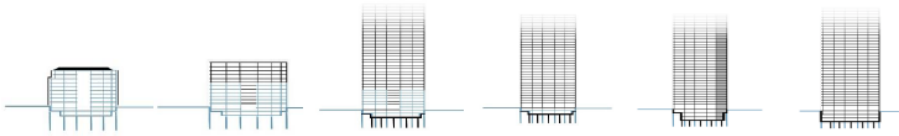
57,074 sqm GIA

- Scenario 9: Full redevelopment. Retained substructure – 0%. Retained superstructure – 0%.

57,549 sqm GIA



862. The following table presents the WLC results of the six options:



	Light Refurbishment MEP & Envelope Upgrade	Refurbishment & Minor Extension Within the capacity of the existing structure	Refurbishment & Major Extension Retaining existing super and sub structure	Refurbishment & Major Extension Retaining substructure	Refurbishment & Major Extension Retaining foundations	Full redevelopment
Option Reference	Scenario 2	Scenario 4	Scenario 5	Scenario 7	Scenario 8	Scenario 9
Project reference period	60	60	60	60	60	60
Gross Internal area (GIA) m <sup>2</sup>	16,051	22,906	54,857	55,469	57,074	57,549
Net Internal area (NIA) m <sup>2</sup>	11,711	16,570	34,536	34,813	35,592	35,592
Change in NIA (compared to existing) m <sup>2</sup>	0%	41%	194%	197%	203%	203%
Substructure % retained by mass	100%	100%	69%	65%	34%	0
Superstructure (Frame, Upper floors, Roof, Stairs and ramps) % retained by mass	100%	100%	57%	0%	0%	0
Total WLCA (incl. B6 & pre-demolition) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA) <i>Module B7 is not considered</i>	975	1,092	1,239	1,289	1,331	1,351
Upfront Embodied Carbon (A1-A5) excl. sequestration (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	395	540	690	730	770	790
In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7 (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	430	430	430	430	430	430
Estimated Whole Building Operational Carbon for building life time (B6) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	150	117	117	117	117	117
Total WLCA (incl. B6 and pre-demolition) (tCO <sub>2</sub> e) <i>Module B7 is not considered</i>	15,648	25,020	67,966	71,475	75,945	77,721
Total existing building demolition (tCO <sub>2</sub> e)	0	131	131	665	803	803
Upfront Embodied carbon (A1-A5) (tCO <sub>2</sub> e)	6,340	12,369	37,851	40,492	43,947	45,464
In-use embodied carbon (B-C) (tCO <sub>2</sub> e)	6,902	9,850	23,589	23,852	24,542	24,746
Operational Carbon for building life time (B6) (tCO <sub>2</sub> e)	2,406	2,670	6,395	6,466	6,653	6,709

Figure 9: WLC options

863. The following graph presents the whole-lifecycle carbon emissions per square metre over 60 years:

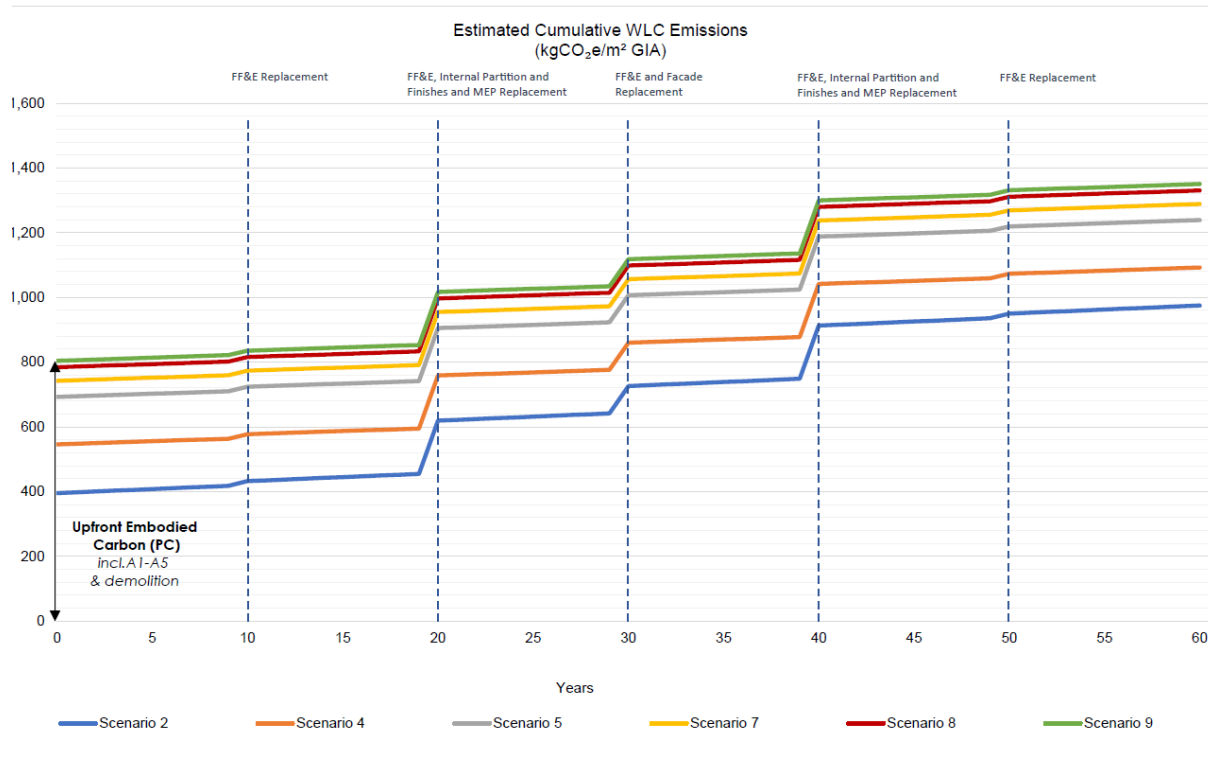


Figure 9. Whole life-cycle carbon emissions per square metre over 60 years

864. Scenarios 5-9 present higher levels of carbon emissions, reflective of the high quantum of development delivered. The carbon pioneering report notes that these scenarios optimise the development potential of the site, due to its location in the emerging city cluster as a potential location for tall buildings, and comply with policies to deliver office space and jobs. Out of these, scenario 5 would present the lowest level of carbon impact due to the retention of 57% of the superstructure, however, a number of constraints are identified, including:

- The existing floor to ceiling heights and the addition of new columns for the development above would compromise the quality and flexibility of office space within the retained levels
- Retention and structural strengthening of the existing building would constrict the ground floor level and impact the delivery of high-quality public realm, retail and amenity.

865. Scenario 7 is identified as the preferred option as a new build with a maximised substructure retention while resulting in fewer absolute carbon emissions due to the lower quantity of new floorspace and associated upfront carbon emissions out of the tower scenarios. It represents a 3.88% uplift in WLC kgCO<sub>2</sub>e/m<sup>2</sup> emissions over Scenario 5 which is justified by the avoidance of the constraints identified above and the delivery of high-quality office space and

a high-quality ground floor. Planning officers consider that scenario 7 would have the best potential for balancing environmental sustainability for climate change adaptation and mitigation, and economic and social sustainability considerations of contributing to the City's additional office floorspace requirements of the highest quality, including health and well-being benefits, and providing improvements to the public realm and publicly accessible facilities.

866. The optioneering approach complies with the GLA's approach to circular economy and whole life-cycle carbon emissions, and with the City Corporation's Carbon Options Guidance PAN.

*Whole life-cycle carbon assessment*

867. London Plan Policy SI 2E (Minimising greenhouse gas emissions) requires referable applications (and encourages major applications) to submit a Whole Life-Cycle Carbon (WLC) assessment against each project 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 embodied carbon emissions, operational carbon emissions from both regulated and unregulated energy use, and potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The WLC assessment closely relates to the Circular Economy assessment, as the reuse and recycling of existing building materials, and the choice of proposed building materials, longevity, flexibility, and adaptability of the proposed design all impact the WLC emissions of the building. The WLC assessment is therefore an important tool to achieve the Mayor's net-carbon city target.
868. The submitted WLC Assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance of the building in comparison to current industry benchmarks.
869. The submitted report presents three scenarios for the embodied carbon intensity of the development:
- Baseline estimate: This is a cautious estimate of the embodied carbon outcome.
  - Proposed Scenario: This is the targeted outcome in consideration of market conditions and the supply chain. It includes assumptions which are aligned with the current cost plan and proposed procurement strategy.
  - Stretched Scenario: This represents a market-leading outcome for a building of this massing and includes all the interventions that the project is

aiming to pursue. It is the project intent to pursue these interventions subject to technical feasibility and commercial viability, however, the team recognises that there is a significant risk around the deliverability of this scenario.

870. The 'proposed scenario' is the proposed development. It is reported in the GLA WLC template and figures in the body of the WLC Assessment reflects these figures.

871. The following carbon reduction strategies are included in the baseline scenario:

- High strength steel columns
- Reuse of existing foundations and limited basement extension
- Optimised slab materiality e.g. use of precast concrete slabs subject to supply chain, logistical and site workability considerations.

872. The following carbon reduction strategies are included in the proposed scenario (the proposed development). They are factored into the cost and procurement plan, and are viable for the development:

- Optimised cement replacement content in concrete elements
- Low carbon aluminium in the façade (industry standard)
- Improvements on business-as-usual fit-outs
- Improvements on business-as-usual site emissions.

873. Further carbon reduction opportunities of the stretched scenario are to be developed in subsequent design stages. These further design and product opportunities include a degree of procurement risk:

- Optimise column materiality
- Reduce reinforcement rates in the core walls
- Explore the viability of low carbon structural steel with high recycled content
- Explore lower carbon aluminium in the façade.

874. With regard to calculating WLC, the GLA guidance requires applicants to use the (original) methodology developed by RICS (Royal Institution of Chartered Surveyors). RICS have published the 2nd edition which has come into full effect on 1 July 2024, requiring assessors to follow this Version 2's requirements when completing a whole life-cycle carbon assessment. The GLA has indicated that it would not update its guidance to reflect these changes for now. The applicants have used RICS Version 2 in accordance with RICS requirements, however, the calculations in compliance with Version 1 and Version 2 have been provided for the October 2024 revision as set out below. The Version 1 results shown in the table below in bold figures are compared with the GLA benchmarks in order to remain in compliance with the requirements of the GLA's WLC Assessment Guidance.
875. Compared with the WLC assessment submitted in July 2024, the WLC addendum submitted in October 2024 highlights that upfront embodied carbon results across all application scheme WLC scenarios remain consistent, however, marginal increases in life-cycle embodied carbon are reported across all application scheme WLC scenarios, attributed to changes in the façade geometry.
876. The table below identifies WLC emissions per square meter for the building in relation to the GLA benchmarks for offices at planning application stage. The table reports calculations using RICS Version 1 methodology, as required in the GLA WLC Assessment Guidance. It also reports calculations using RICS Version 2 methodology, for information only. RICS version 2 is an updated methodology that includes a 15% contingency and several new assumptions across specific life-cycle modules.

Table 8. WLC emissions per square meter (RICS Version 1 and Version 2)

Scope	<b>Proposed development (RICS V1)</b>	Proposed development (RICS V2)	Benchmark	GLA benchmark
RICS components	<b>kgCO2/m2</b>	kgCO2/m2	kgCO2/m2	
A1-A5	<b>805</b>	888	< 950	GLA standard
			< 600	GLA aspirational
A-C	<b>1,300</b>	1,397	< 1,400	GLA standard

(excluding B6-B7)			< 970	GLA aspirational
B6+B7	<b>1,465</b>	1,465		
A-C (including B6-B7)	<b>2,765</b>	2,863		

877. The WLC RICS Version 1 Assessment Spreadsheet, submitted in November 2024, calculates that the proposed development would result in 167,672,877 kg CO<sub>2</sub>e whole life-cycle carbon being emitted over a 60-year period. Of this figure, operational carbon emissions would account for 88,859,976 kg CO<sub>2</sub>e (53% of the building's whole life-cycle carbon), and the embodied carbon emissions for 78,812,902 kg CO<sub>2</sub>e (47% of the building's whole life-cycle carbon).
878. The WLC RICS Version 2 Assessment Spreadsheet, submitted in October 2024, calculates that the proposed development would result in 173,596,716 kg CO<sub>2</sub>e whole life-cycle carbon being emitted over a 60-year period. Of this figure, operational carbon emissions would account for 88,859,976 kg CO<sub>2</sub>e (51% of the building's whole life-cycle carbon), and the embodied carbon emissions for 84,736,740 kg CO<sub>2</sub>e (49% of the building's whole life-cycle carbon).
879. A detailed whole life-cycle carbon assessment and a confirmation of the post-construction results in accordance with the GLA guidance are required by conditions.
880. The submitted WLC assessment and circular economy strategy demonstrate the opportunities of the proposal and proposed actions to reduce carbon emissions and therefore comply with the London Plan policy SI 2E, Local Plan 2015 policy CS15 and emerging City Plan policies S8 and DE1. By committing to an exemplar reduction of whole life-cycle carbon emissions through the submitted strategic approach that is required to be confirmed at detailed design stage, the development would contribute to the transition to a low carbon future in accordance with NPPF (2023) paragraphs 157 and 159.

### **Urban Greening**

881. London Plan Policy G5 requires major developments to contribute to London's greening agenda through the incorporation of green infrastructure and

landscaping within the design of new sites. A minimum Urban Greening Factor (UGF) score of 0.3 is recommended for non-residential developments. Local Plan Policies DM10.2, CS19 and DM19.2 encourage the installation of green roofs and walls, with CS19 encouraging the provision of high-quality landscaped roof gardens and terraces, and DM19.2 calling for development to promote biodiversity and urban greening through a range of features. Emerging City Plan 2040 Policy OS2 calls for high levels of greening that consider the specific site context and aim to enhance biodiversity, reduce urban heat, and improve public amenity.

882. The proposed development would incorporate landscaping features integrated into the public realm at ground level and across multiple elevated terraces, providing a variety of planting environments. Key features include:
- Ground level public realm: A planted Undercroft area incorporates shade-tolerant species including climbers, ferns, grasses and perennials.
  - Podium terrace at level 6 and balconies at levels 8-33: A mix of planting would be provided along the edge of the terrace and balconies.
  - Terraces at levels 34 and 35: Planting within the terraces would include a mix of grasses, perennials, shrubs and flowering species alongside 12 and 9 trees (at levels 34 and 35 respectively) selected for their adaptability to urban conditions.
  - Roof levels 36 and 36 mezzanine: A green roof would be implemented.
  - Green walls and climbers: Green wall systems are included across various areas of the façade with climbing plants that are rooted at ground level.
883. The proposed landscaping achieves a calculated UGF of 0.33, surpassing the London Plan's 0.3 target for non-residential developments.
884. The site in its existing state has minimal green infrastructure. Consequently, all proposed soft landscaping features would provide a net increase in green coverage and contribute positively to the site's ecological value. This includes the integration of native species and resilient plants designed to support biodiversity and respond to the City's climate adaptation goals.
885. Final details of landscaping and maintenance would be secured by condition, which would include species mix, numbers and locations. This would ensure that the proposed landscaping are appropriate within urban conditions and are maintained in perpetuity.

886. The proposal represents an enhancement in green infrastructure on the site, offering both ecological and amenity benefits that contribute to London's broader greening strategy. The proposed UGF score of 0.33, along with the soft landscaping features across multiple levels, is considered to comply with London Plan Policies G5 and Local Plan Policies DM10.2, CS19 and DM19.2.

### **Climate Resilience**

887. London Plan Policy GG6 calls for development to help London become a more efficient and resilient city, including by ensuring buildings and infrastructure are designed to adapt to a changing climate. London Plan Policy DM 15.5 requires new developments to incorporate design measures that adapt to the impacts of climate change, such as managing surface water, minimizing overheating, and providing adequate ventilation. Emerging City Plan 2040 Strategic Policy S15 and associated Policies CR1 and CR2 build on this, mandating that all new development demonstrate resilience to the projected effects of climate change, including increased flood risk and extreme weather events.
888. The City's Lead Environment Resilience Officer has reviewed the application with regard to climate resilience. Specifically, the officer has reviewed the Sustainability Statement and associated addendum, Flood Risk Assessment and Drainage Strategy and the RIBA Stage 2 Adaptation to Climate Change Workshop document. The Officer has raised no objections and considers the proposed development complies with the forementioned policies.

### **Overheating and the urban heat island effect**

889. Overheating mitigation has been considered within the proposed development, with multiple passive and active measures to mitigate overheating and address urban heat island impacts. These include:
- The building uses high-efficiency glazing with low G-value properties, which limits solar heat gain while optimizing natural daylight, helping to reduce internal overheating during warmer months
  - The facade has been modelled and optimised using solar analysis tools to minimise heat absorption. A lighter coloured material palette is proposed to reduce the building's contribution to urban heat.
  - The design incorporates greenery throughout the external terraces across levels, providing shade and cooling through evapotranspiration. Vertical green elements on the western facade further enhance thermal comfort by lowering solar absorption and cooling the building.



- A mechanical cooling system is proposed to maintain comfortable internal temperatures. Future climate scenarios were considered, with internal temperatures modelled up to 2050, ensuring resilience against potential climate-induced temperature increases.

890. These combined strategies ensure that the development remains resilient against overheating and UHI impacts, promoting thermal comfort for occupants and the surrounding urban environment.

### Flooding

891. The application site is located within Flood Zone 1 and is therefore identified as being an area at very low or low risk of fluvial and tidal flooding.

892. Surface water would be attenuated by smart tanks and blue/green roofs to reduce the discharge rate to 2L/s.

893. A SuDS feasibility study has been undertaken by Arup, which forms part of the submitted document Flood Risk Assessment and Drainage Strategy, exploring different options to manage discharge rates. The options found to be suitable and to be incorporated into the development include harvesting and use of rainwater, rainwater attenuation in blue/green/brown roofs and controlled discharge of excess rainwater to the combined sewer system via attenuation tanks.

894. These combined strategies ensure the development reduce rainwater discharge rates in line with Chapter 14 of the NPPF and the London Plan, in turn minimising any contribution to flooding in the area.

### Water stress

895. The Sustainability Statement identifies low flow features as measures to reduce the operational carbon emissions, with 17% of water sources proposed to be from recycling. This includes the use of greywater and rainwater re-use throughout the proposed development, such as the collection of greywater for flushing and rainwater use for irrigation.

896. The development will achieve 4 out of 5 credits available under BREEAM Wat 01.

### Biodiversity and pests and diseases

897. The proposed development will achieve a notable net gain in biodiversity, with an increase from a baseline habitat value of 0.00 to a post-development score

of 0.45 habitat units. This improvement results from on-site enhancements, including green roofs, ground-based green walls, ground-level planters, and urban trees. These biodiversity measures align with the City of London's goals for urban greening and ecological enhancement.

898. The development is set to achieve an Urban Greening Factor (UGF) score of 0.33 using the London Plan methodology, which exceeds the target threshold of 0.3. The design incorporates green infrastructure at various levels, with ground-level planting, a green wall, and green roofs on levels 36 and 36M.
899. A range of suitable native and non-native plant species are proposed, selected to enhance biodiversity within the urban context and to ensure resilience in an urban environment. These species are expected to provide valuable habitat resources for local wildlife, especially when managed under a proper maintenance regime.
900. The proposed planting palette has been designed to minimize vulnerability to pests and diseases. No plant species that are highly susceptible to pest and disease issues have been included, ensuring that the development's green infrastructure remains robust and sustainable.
901. A series of conditions are recommended to secure the implementation, maintenance, and management of the proposed urban greening and biodiversity measures to maximize their long-term ecological value and performance.

#### *Flood, Trade and Infrastructure*

902. The proposed development would make a positive contribution to the City of London, with the potential to mitigate some of the wider impacts of climate change.
903. The proposed development would include facilities that are directly beneficial, such as the retail and cultural/community/education spaces. The proposed facilities would enable occupiers to use active transport including cycling and reducing the dependence on transport infrastructure.
904. The proposed development is set up to reduce the overall energy demand and peaks, using passive designs, low energy lighting and energy recycling.

#### *Conclusion on Climate Resilience*

905. Overall, the proposal is considered to be acceptable in terms of climate resilience and in accordance with London Plan Policy GG6 and London Plan Policy DM15.5.

### **Conclusion on Sustainability**

906. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. Actions in the strategy encourage carbon analysis, zero carbon technologies, circular economy principles, climate resilience measures, urban greening and biodiversity in the Square Mile. Local Plan 2015 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 adaptation measures, urban greening and promoting biodiversity and minimising waste. The emerging City Plan 2040 includes policies on sustainable design which require development to take a retrofit first approach, minimise whole life-cycle carbon, embed circular economy principles, embed climate resilience and contribute to the wider sustainability of the Square Mile.
907. The proposed development would deliver a tall building in the emerging City Cluster in the Square Mile. Adaptation and extension opportunities of the existing building are limited due to constraints of the structural core and grid, as well as limitations of the design to disassemble building elements. The options assessment concludes that the proposed development, a new build with 20% of structural retention, would optimise the development potential of the site. The proposal delivers a flexible, adaptable and high-quality office space, an improvement to the public realm, and the delivery of greening and climate resilience measures. Thus, the proposal would contribute to future proofing London against a range of environmental, social and economic challenges.
908. The proposed development delivers key sustainability policies for the City. The proposal embeds circular economy principles and a whole life-cycle carbon approach to minimise both upfront and in use embodied carbon emissions. It achieves the GLA standard benchmark for commercial buildings which is recognised as a challenge for the tall building typology. The energy assessment demonstrates how the building would achieve high energy efficiency standards through passive design measures and a system of PV panels and heat pumps. The overall 29% reduction in regulated carbon emissions beyond Part L is considered to be an excellent achievement, exceeding other commercial developments in the City of London recently assessed. The proposed development targets an 'Outstanding' BREEAM rating. It is also targeting an ambitious NABERS UK 5.5 star rating and a Platinum WELL Standard. The proposal is considered to be in overall compliance with London Plan policy SI 2, SI 7, Local Plan policy CS15 and DM17.2, as well as emerging City Plan

2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

### **Security**

909. London Plan Policy D11 requires developments to incorporate measures to design out crime and deter terrorism, proportionate to the risks, while also supporting detection and mitigating effects. These measures should be integrated into the design from the early stages and harmonised with the development's aesthetic. Local Plan Policy CS3 seeks to ensure that the City is protected from crime, disorder, and terrorism. Policy DM3.2 calls for early engagement with the City of London Police to ensure security features are integrated into the design, while Policy DM3.3 requires the incorporation of Hostile Vehicle Mitigation (HVM) where appropriate.
910. The proposed development would be protected by a 'security line', which has been designed in consultation with the City of London Police and includes measures for Hostile Vehicle Mitigation (HVM). The HVM strategy comprises a combination of security features at ground level, including:
- HVM wall and upstand along the northern façade.
  - 'Goal post' structure around the main entrance.
  - Upstand along the western façade.
  - HVM planters along the western edge of the Undercroft.
  - Retractable bollards across the vehicle access point.
911. These features are discreetly integrated into the landscape, preserving the aesthetic quality of the public realm while providing a robust security line around the building that does not compromise access for the public and office users.
912. The above HVM measures are combined with a comprehensive security strategy (including CCTV and access control advice) to further protect from hostile acts. Further details of the HVM would be required by condition.
913. Public access within the development would also be managed, with access gain to the Sanctuary and the Garden, controlled through in-advance bookings or

'walk up' ticket sales which require checking in within the Undercroft. These processes would ensure access to level 35 is controlled and that the necessary security and screening processes can be undertaken.

914. Further details of the overall management and operation of the public areas in the proposed development would be requested under S.106. The Inclusive Access Management Plan, secured under planning condition, would require an inclusive security strategy to ensure measures take into consideration the different user groups.
915. The proposal, subject to conditions and S.106 obligations, is considered to be acceptable and in accordance with London Plan Policy D11, Local Plan Policies DM3.2, DM3.3 and DM3.5.

### **Suicide Prevention**

916. Local Plan Policy DM3.2 aims to ensure that appropriate measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm. Policy DE4 'Terraces and Elevated Public Space' of the emerging City Plan 2040 advises that appropriate safety measures should be included in high rise buildings to prevent people from jumping or falling.
917. The City of London 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 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 deterrence 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.
918. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building Regulation K2 states the following:
  - (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.
919. 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 BS6180: Barriers in and around buildings.
920. 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 advised a barrier height of at least 2.5m high, no toe or foot holes, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale off from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with building regulations 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 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.
921. The proposed design incorporates suicide prevention measures, particularly for the proposed terraces. The two high-level terraces (levels 34 and 35) are equipped with 2.5m high balustrades, combining open vertical railings and solid glazed panels to prevent attempts while maintaining views and ventilation, while other smaller terraces feature 1.4m high balustrades. The height of these balustrades exceeds the minimum height set out under Building Regulation K2 and is in line with the height recommended by UKHSA. The strategy also aligns with the City of London's guidance on preventing suicides in high-rise buildings and would be reviewed as part of the ongoing design process to further explore measures such as CCTV, hostile planting, and access to suicide prevention support, full details of which would be secured via condition.
922. Subject to the recommended condition, the proposals would comply with Policy DM3.2 of the Local Plan 2015 and Policy DE4 of the emerging City Plan 2040.

## **Health Impact Assessment**

923. Policy HL9 of the emerging City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts. Policy GG3D of the London Plan mandates that developments assess the impacts on mental and physical health and wellbeing, with the goal of mitigating any negative effects while maximising positive outcomes. Health Impact Assessments (HIAs) play a crucial role in ensuring that developments contribute to the wellbeing of communities and reduce health inequalities.
924. The applicant has submitted a Health Impact Assessment (HIA) for the proposed development at 60 Gracechurch Street. The HIA follows the London Healthy Urban Development Unit (HUDU) guidance and assesses five key health determinants: engagement, active lifestyles, a healthy environment and design, safe and vibrant neighbourhoods, and access to work and training. The overall conclusion is that the development will have a beneficial impact on health and wellbeing across these key determinants.
925. The HIA identifies several positive health outcomes, including:
- **Engagement:** The public consultation programme for the development involved significant engagement with local stakeholders, ensuring that community concerns were addressed. The ongoing commitment to community engagement is expected to foster a stronger connection between the development and the local community.
  - **Active lifestyles:** The proposed development promotes active travel by enhancing public realm spaces, integrating cycle parking, and connecting with existing walking and cycling networks. This will encourage physical activity and healthier lifestyles among users.
  - **Healthy environment and design:** The incorporation of sustainable urban drainage systems, renewable energy technologies, and air quality improvement measures will contribute to a healthier environment. Additionally, the design includes shaded areas and green infrastructure to mitigate urban heat island effects and improve air quality.
  - **Safe and vibrant neighbourhoods:** The development is designed with safety in mind, incorporating passive surveillance, Secure by Design principles, and improved public spaces that foster social interaction. These elements contribute to a vibrant and inclusive neighbourhood.
  - **Access to work and training:** The development will create job opportunities during both the construction and operational phases, benefiting the local

economy. The inclusion of a learning space at level 35 will provide educational opportunities, particularly for school groups from deprived areas.

926. The HIA outlines several recommendations to further enhance the positive health impacts of the development:

- Continued engagement with future users and the local community throughout the operational phase of the development to ensure that changing needs are met.
- Commit to local procurement strategies, as well as training and employment agreements, to ensure that local residents and businesses.
- Incorporating more edible planting in the green infrastructure to promote access to healthy food.

927. Potential impacts identified would be mitigate so far as possible by the requirements of relevant conditions and obligations within the S.106 agreement.

928. Overall, officers consider that the development seeks to improve the health and address inequalities, the residual impact would be acceptable and the proposals would comply with London Plan Policy GG3 and emerging City Plan 2040 Policy HL9.

### **Fire Statement**

929. London Plan Policy D12 requires that all developments achieve the highest standards of fire safety to ensure the safety of occupants and efficient evacuation in case of an emergency. London Plan Policy D5 further mandates that the building design incorporates provisions for safe and dignified emergency evacuation for all users, including those with reduced mobility.

930. A Fire Statement, prepared by Arup, was submitted with this application in line with London Plan Policy D12 B for major developments. The statement outlines a comprehensive fire safety strategy for the building, which includes a phased evacuation strategy supported by Category L1 automatic fire detection systems and a voice alarm system. The building would be equipped with two independent firefighting shafts, each with a dedicated firefighting stair, evacuation lifts, wet risers, and mechanical smoke extraction systems. Sprinkler protection would be provided throughout the building, and compartment floors with 120-minute fire resistance would limit the spread of fire. The building façade is designed to prevent external fire spread,



incorporating non-combustible materials where necessary, particularly near site boundaries.

931. For persons with reduced mobility, the design includes protected refuges at each level, equipped with emergency voice communication systems. Dedicated evacuation lifts would serve all levels except for plant areas, ensuring equitable means of escape. A tailored Personal Emergency Evacuation Plan (PEEP) would be prepared by building management for each person using the building who may not be able to escape in a timely manner unaided. Details of inclusive emergency procedures would be requested under the Inclusive Access Management Plan to ensure escape routes and staff training has been considered for disabled people including where there is not a separate firefighting and evacuation lift.
932. The fire strategy incorporates provisions for ongoing safety, with measures to ensure that any future modifications to the building would not compromise its fire safety design. The Responsible Person, under the Regulatory Reform (Fire Safety) Order 2005, would oversee compliance with fire safety requirements during the operational phase.
933. The City's District Surveyor has reviewed the Fire Statement and raises no objections, confirming that the proposal complies with London Plan Policies D5 and D12. A condition would ensure the development is undertaken in accordance with the approved Fire Statement. Accordingly, officers consider the proposed development is acceptable in terms of fire safety.

**Assessment of Public Benefits and paragraph 208 NPPF balancing exercise**

934. Under S.66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects the setting of a listed building/s the Corporation shall have special regard to the desirability of preserving the building/s or its/their settings or any features of special architectural or historic interest which they possess.
935. 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 paragraphs 205 and 206).
936. The proposal would result in varying levels of less than substantial harm to the following heritage assets:

- The Monument (Grade I) – low level of less than substantial harm
  - Tower Bridge (Grade I) – low level of less than substantial harm
  - Eastcheap Conservation Area – slight level of less than substantial harm (at the lowest end of the spectrum)
937. Given the proposal would result in harm to the significance of a Grade I listed building and a conservation area, there is a strong presumption against the granting of planning permission. Notwithstanding, that presumption is capable of being rebutted via wider public benefits.
938. 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’. Officers have negotiated and identified multi-faceted benefits stemming directly from the scheme, with the key economic, environmental and social public benefits detailed below:

**Economic Benefits**

- The proposal would deliver an uplift of 38,878sqm of office floorspace (a total of 52,012sqm GIA in Grade A offices) on the site, contributing a notable 2.4% toward the City’s projected additional minimum requirement of 1.6 million sqm GIA of office space by 2040. This is a notable contribution by a single development to the City’s strategic economic objective. The proposal is projected to support 3,315 gross Full-Time Equivalent (FTE) jobs directly on-site, resulting in a net increase of 1,786 FTE jobs when accounting for existing site employment and displacement effects. Additionally, the proposal would generate an estimated 518 indirect and induced FTE jobs through local services and supply chains, further bolstering the local economy. These jobs would directly support the City’s reputation as a leading global financial hub, contributing significantly to its economic resilience.
- Over the 41-month construction period, the development is expected to generate 1,106 direct FTE construction jobs annually, along with 365 indirect jobs in supply chains and services. This would support the construction sector and have a positive impact on local businesses, leading to additional economic uplift through worker spending during this period.

- The completed development is expected to generate significant operational worker expenditure, estimated between £4.6 million and £7.7 million annually. This includes spending on local services such as retail, cafes, and hospitality, providing a substantial boost to the local economy. The provision of the publicly accessible spaces throughout the development would drive footfall in the wider area during the day, evenings and weekends, in turn helping to activate the public realm and support nearby businesses.
- The overall quality of the development and proposals offer would attract visitors, increase tourism, support and improve worker productivity and enhance the image of the area.

939. Collectively, given the nature and extent of these benefits, **substantial** weight should be attributed to them.

### **Environmental Benefits**

- The proposal would assist in consolidating the emerging City Cluster of tall buildings resulting in some minor enhancements of strategic and local neighbouring boroughs' views which are important to the character and identity of London including LVMF views from: Alexandra Palace (1), Parliament Hill (2), Primrose Hill (4), Greenwich Park (5) and Blackheath Point (6).
- The scheme would deliver growth 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.
- At local ground level, the proposal would enhance the public realm through the addition of the publicly accessible area, the Undercroft. This dynamic space would act as a destination for users to sit and gather during the day, in addition to forming an integral part of the arrival experience for the Sanctuary, Garden and Learning Space at level 35. These spaces would combine to form a compelling new destination for the City, supporting active and cultural uses which will enhance the vitality, character and distinctiveness of the site and wider City Cluster, including new views and heritage appreciation all of which align with Destination City, the City's strategic cultural objective.
- Improvements to the public realm (public highways around the perimeter of the site) for pedestrians through widening and resurfacing of footways. These works would improve pedestrian priority, the function and appearance of the street. Active travel would be encouraged as well as

supporting the wellbeing of users, constituting a key social and environmental benefit in a highly congested area. Details of these works would be confirmed through a S.278 agreement, where opportunities for opportunities to introduce resting spots at 50m increments would also be scoped to improve inclusivity of users.

- The proposal would incorporate a significant uplift in greening and biodiversity benefits across ground floor level and the proposed terraces. This would support the creation of biodiversity corridors across the City.

940. Collectively these are attributed a **moderate** level of weight.

### **Social Benefits**

- The proposal would deliver remodelled and improved social spaces at ground level and a new elevated public space at level 35 in an area with limited external public realm for workers, visitors and residents, this would provide opportunities for socialising, relaxation and leisure and would provide people with views of London.
- The proposal would deliver a combined 694sqm of free-to-access multifunctional space (the Sanctuary, Garden and Learning Space) at level 35, and at ground level cultural passageway (the Journey), offering social, educational, and wellbeing benefits. This space would serve as a cultural asset, through facilitating programs for schools and community groups and attracting users from all over with the extensive views to the west and south, across the City, Westminster, Southwark and beyond.
- The proposed ground level Undercroft area in combination with the proposed café within the building would help animate the public spaces mentioned above and enhance their amenity and use by the public.
- The proposal would secure S.106 obligations of £2,224,000 (including monitoring) towards affordable housing provision and £1,334,400 towards training, skills and job brokerage.

941. Collectively these are attributed a **moderate to substantial** level of weight.

### **Conclusion of Public Benefits**

942. In carrying out the paragraph 208 NPPF balancing exercise, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings. The proposal would, cause a low level of less than substantial harm to the significance of the Grade I listed The Monument and

the Grade I listed Tower Bridge. In assessing the weight to be given to that harm in the balancing exercise the extent of the assessed harm (low level) and the heritage value of the asset in question (high, as Grade I listed buildings) must be taken into account. In addition, a slight level of less than substantial harm would be caused to the significance of the Eastcheap Conservation Area.

943. Great weight must be given to the conservation of all designated heritage assets, and officers have done so in undertaking this balancing assessment.
944. It is the view of officers that the collective package of the public benefits secured would, giving great weight to the heritage harm, outweigh the heritage harm identified. On that basis there is clear and convincing justification for the harm, and the presumption against granting planning permission is rebutted, the outcome of the paragraph 208 NPPF heritage balance falls in favour of the proposal.

### **Planning Obligations and Community Infrastructure Levy**

#### **CIL and Planning Obligations**

945. 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.
946. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
947. 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).
948. CIL contributions and City of London Planning obligations are set out below.

#### **MCIL2**

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
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<b>MCIL2 payable</b>	£7,535,721.29	£7,234,292.43	£301,428.85
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**City CIL and S.106 Planning Obligations**

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for monitoring</b>
<b>City CIL</b>	£3,336,000	£3,169,200	£166,800
<b>City Planning Obligations</b>			
Affordable Housing	£2,224,000	£2,201,760	£22,240
Local, Training, Skills and Job Brokerage	£1,334,400	£1,321,056	£13,344
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£512,785	£512,785	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£100,000	£100,000	£0
Security Measures Contribution (Eastern City Cluster)	£444,800	£440,352	£4,448
S.106 Monitoring Charge (for non-financial obligations)	£5,500	£0	£5,500
<b>Total liability in accordance with the City of London's policies</b>	<b>£7,957,485</b>	<b>£7,745,153</b>	<b>£212,332</b>

### **City's Planning Obligations**

949. 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)
- Delivery and Servicing Management Plan (including Consolidation and refuse and recycling)
- Travel Plan (including Cycling Promotion Plan and Management Plan for the Accessible Car Parking Space)
- Local Procurement Strategy
- Employment and Skills Plan (Demolition / Construction)
- Construction Monitoring Cost (£53,820 for first year of development and £46,460 for subsequent years)
- Section 278 Agreement (CoL)
- Section 278 Agreement (*Transport for London*)
- A10 Transport for London Road Network (TLRN) improvement scheme contribution (£683,658 BCIS index linked) or the completion of a S.278 agreement with TfL, relating to Highways Improvements to include but not be limited to:
  - Safety improvements to junctions in the vicinity of the site
  - Measures in the vicinity of the site to improve safety and security at night and reduce fear of crime
  - Pedestrian corridor improvements in the vicinity of the site
  - Any other strategic highway mitigation works reasonably necessary to make the development acceptable

- Cycle Hire Contribution (£100,000)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Elevated Public Spaces (Sanctuary and Roof Garden) (Specification, Public Access & Management Plan to include operator)
- Public Accessible Spaces and Passageway (the Journey)
- Learning Space (Management Plan, Specification and Public Access including operator)
- Cultural Implementation Strategy
- Television Interference Survey
- Public Realm (the Undercroft) (Specifications, Public Access, Management Plan and Operation)
- Wind Audit
- Solar Glare
- Methodology, full design and materiality details, drawings and other supporting information to be approved for the southern and eastern facades (including details of the lighting strategy and solar glare)
- Public Lifts (Specification, Maintenance and Management)

950. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S.278 agreement.

951. The scope of the CoL S.278 agreement may include, but is not limited to:

- Fenchurch Street
- Repaving the adjacent footways in Yorkstone material
- Widening of the footway and associated works



- Introduction of resting places, subject to feasibility study
- Resurfacing of the carriageway fronting the site
- Provision of Road Markings and associated traffic orders to suit new site layout
- Any repair works and other necessary works to deliver the above.

952. The scope of the TfL S.278 agreement may include, but not be limited to:

- One pit lane on A10 Gracechurch Street to support construction of the development
- Crossing improvements to south east corner of the Gracechurch Street/Fenchurch Street/Lombard Street junction, as per the following:
  - Potential signal retiming at the same junction
  - Supporting highway modelling if necessary
  - Following TfL Streetscape Guidance with approval from TfL
  - The design should ensure sufficient space along the A10 for bus operations and for cyclists to travel safely on the near side, both northwards and southwards
- Scope of works to be co-ordinated with 70 Gracechurch Street development scope of highway works
- All the above are subject to Road Safety Audits (RSAs)

#### **Monitoring and Administrative Costs**

953. 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.

954. 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)**

955. The City, as a public authority must, in exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited 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.

956. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. It is the view of officers that a decision to grant permission in this case would reduce barriers to access for disabled people through the provision of an enhanced and step-free public realm and a blue badge parking space on site. Officers also consider that the provision of accessible floorspace, and publicly accessible garden, learning space would advance equality of opportunity.

957. The proposed development would not result in an adverse impact on the ability to use the surrounding churches as places of worship and religious observance. As such, there would be no impact on those who share a protected characteristic relating to religious beliefs and practices.

### **Human Rights Act 1998**

958. 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)).

959. Insofar as the grant of planning permission would result in interference with right to private and family life (Article 8 of the ECHR), particularly regarding residential amenity of neighbouring 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. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby residential properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policies DM10.7 and DM15.7 and emerging City Plan 20240 Policies DE7, HS3 and HL3. The public benefits of the scheme, including the provision of additional office floorspace within the proposed development, which contributes to the Local Plan's ambitions for additional office floorspace

within the emerging City Cluster area, strengthening the City's primary business and professional services function, are considered to outweigh the adverse impacts on nearby residents.

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

### **Conclusion and Overall Planning Balance**

961. 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 London Plan 2021, the emerging City Plan 2040 and considering all other material considerations.
962. An Environmental Statement accompanies the scheme, which assesses the likely significant environmental effects that have the potential to arise as a result of the proposed development, both during the demolition and construction works and on completion and occupation of the proposed development. The environmental disciplines identified in the Environmental Statement include Air Quality, Noise and Vibration, Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, Wind Microclimate, Heritage, Townscape and Visual Impact Assessment, and Climate Change. This Committee must consider the information to make a reasoned conclusion on the significant environmental effects identified in the Environmental Statement and considered in Appendix A of this report.
963. The consultation process of the planning application commenced upon validation of the application in July 2024 for a period of 30 days. Following amendments to the proposed design relating primarily to the set back of the western bay of the proposed east elevation to separate this section of the proposed tower from the party wall, updates to the initial submission documents, including the Environmental Statement, were submitted to the Local Planning Authority in October 2024 and a second round of public consultation occurred on the 22<sup>nd</sup> of October 2024 for a period of 30 days.
964. The Environmental Statement is available online, together with the application, drawings, any additional information received over the course of the application, relevant policy documents and the representations received in respect of the application during the two public consultations.

965. The additional information received over the course of the application process and all consultation responses received over the two rounds of consultation have been taken into consideration in the assessment of the application and for the purposes of reaching the reasoned conclusion.
966. Objections and comments have been received from statutory consultees including Historic England, Historic Royal Palaces, St' Pauls Cathedral, the London Borough of Tower Hamlets, relating to the design of the development, its impact on designated heritage assets and the impact on the environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S.106 obligations.
967. The application received three public representations over the course of the application. One comment was neutral and the other two were from residents of the Jamaica Buildings objecting on the grounds of the impacts caused to the amenities of nearby occupants caused by additional development, primarily during construction, in a dense and overdeveloped urban area and recommending planning conditions to take into consideration restrictions on nighttime construction. This report has considered these comments, including any requisite mitigation which would be secured by conditions.
968. The proposed development comprises the demolition of the existing building with the retention of its existing basement, and its replacement with an office-led tower incorporating a new public realm area at ground level with level access and elevated free publicly accessible spaces including interior and exterior areas comprising of a roof terrace with landscaping features, the Garden, the Sanctuary and a Learning Space (educational and gallery space for the use of schools and community groups) at level 35. The proposal would deliver a high quality, office-led development in the emerging City Cluster, which would meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses and maintaining the City's position as the world leading business centre.
969. 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. The site is central to the City's growth modelling and would deliver a significant proportion 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.

970. The scheme would provide 52,012sqm (GIA) of office space (Use Class E(g)) which would be flexible, sustainable Grade A office floorspace suitable for circa on the site suitable for circa 3,295 FTE City workers, would be provided as part of the scheme. The proposed office floorplates are designed to be subdivided and arranged in a number of ways to accommodate a range of office occupiers.
971. The commercial office space would be complemented by the provision of 187sqm of retail/café space at the ground level and 611sqm (GIA) cultural floorspace of high quality, publicly accessible elevated viewing spaces and a ground level passageway. The ground level would offer an increase in inclusive, inviting, and animated spaces at the southwest of the emerging City Cluster through the creation of a quality public realm area of 368sqm. The biophilic design and the mix of soft and hard landscaping features in this space would allude to the roof garden at level 35 and with the support of acoustic designs, to be secured by condition, it would promote a calming experience for the visitors. The proposed development would create provision of areas for other workers, visitors and residents of the City in accordance with adopted and emerging policies of the development plan. The proposal would contribute towards the network of free viewing galleries across the City.
972. Final details of the operation of the public realm and cultural/public spaces would be secured through the S.106 as part of the Cultural Implementation Strategy and Management Plans.
973. The proposals incorporate urban greening primarily on its west façade along the terrace spine, which offers amenity areas to the office users, on level 35 public roof garden, and at the ground level public realm area. This level of urban greening has been carefully integrated into the design of the building and would enable it to make a significant beneficial contribution to the landmark qualities of the building, befitting the pivotal location of the site at the western edge of the emerging City Cluster. This is in accordance with London Plan policies D3 (D1- 4, 11-14C), City Plan policies S10 and DM 10.1, and emerging City Plan 2040 policies S8 (7 & 8, 21) and London Plan D4, relevant sections of the NPPF.
974. The amount of active retail frontage at the extent of the site's two street frontages is largely retained and upgraded. The proposals will result in some loss of activation along Fenchurch Street, which is a designed PSC and this is resisted by the adopted Local Plan Policy CS20, DM20.1 and emerging City Plan Policy RE1. However, the introduction of additional active frontage and animated spaces along Gracechurch Street, responds better to the proposals, as the visitors' journey begins at Gracechurch Street and the presence of a café area at this location would support this activity. Officers also consider that the activation along Gracechurch Street frontage would create better directional

opportunities to the main entrance of Leadenhall Market, located at the same street frontage towards the north. Compared to the existing unit, the proposed ground floor, works better with the existing level constraints at the site, offering level access to the café from the same entry point at the northwest corner of the building and step-free secondary access from the new public realm. For the reasons outlined here, the proposals are considered to be acceptable. Conditions have been recommended to secure the floorspaces of the land uses.

975. The proposals would optimise the use of land, delivering high quality office space, and publicly accessible spaces. The site's interfaces with and contribution to its surroundings would be significantly improved. 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. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 DE2 London Plan D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5,6.
976. In terms of transport, 849 long term bicycle spaces would be provided with associated shower and locker facilities and 41 short stay spaces would be provided. The scheme is in compliance with Local Plan Policy 16.3 and London Plan Policy T5. The scheme includes a dedicated cycle entrance on Fenchurch Street leading to three lifts within the ground floor of the building and then to the basement cycle parking storage. Of the total short stay spaces, 14 would be provided within the Undercroft area to the south to provide direct level access with Gracechurch Street. Accessible cycle parking spaces have been included in line with the requirements of London Plan, and one accessible car parking space would be provided in the Undercroft area for the users of the building in line with London Plan Policy T6. A Travel Plan would be secured via S.106 to support disabled people associated with this development through various measures. Conditions have been recommended to ensure the cycle parking would be designed in accordance with London Cycling Design Standards.
977. In addition to the above other transport matters have been addressed in the proposals. The proposed highways improvements for the widening of the footways and resurfacing works, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authorities and the appointed contractor, in accordance with construction regulations and logistic guidance. Servicing would take place overnight, between 23:00 and 7:00, in the Undercroft through a booking system to be secured under management plans in the S.106 and the servicing trips

proposed for the proposed mixed use development would be consolidated by 75% and this is considered acceptable with conditions and S.106 obligations recommended to secure the servicing and delivering arrangements.

978. 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. The residential properties that would see most significant impact from the proposed development in terms of percentage values would be 11 Eastcheap facing an overall Moderate Adverse effect, 4 Brabant Court facing an overall Minor-to-Moderate Adverse effect, and 2-3 Philpot Lane facing Major Adverse effect. The impact from the proposed development to the daylight of these properties is highly attributed to the very low existing daylight values they receive. On that basis, it is considered that any change at all is going to be proportionally large in percentage terms, but would not be noticeable. Some windows affected are also considered to be 'less important' windows, such as bedrooms, as identified within the BRE guidelines. This assessment has been reviewed by BRE on behalf of the City of London and their views and reasoned conclusions were generally in line with these in the Environmental Statement. Where there were conflicting views, these were on the identified scale of impact attributed to properties primarily in the cumulative scenarios, however, in most instances the proposed development had very little or no impact to these properties. Considering BRE Guidance, the nature of the results and the sites location within a dense urban environment, it is not considered that the proposal would reduce the daylight to nearby properties to unacceptable levels such that it would warrant a refusal of permission.
979. An options assessment was conducted with a 'retrofit first' approach in accordance with the Carbon Options Guidance and the GLA Circular Economy Guidance and concluded that the retention and retrofit of the existing building would not meet optimal sustainability and policy objectives for the site and its position in the City context. The proposed building would be designed to the highest sustainability standards and delivers key sustainability policies for the City. The proposal delivers a flexible, adaptable and high-quality office space, an improvement to the public realm, and the delivery of greening and climate resilience measures. Thus, the proposal would contribute to future proofing London against a range of environmental, social and economic challenges.
980. The proposal incorporates a significant element of integrated urban greening, climate resilience measures, and is targeting a BREEAM 'Outstanding' rating. It embeds circular economy principles and a whole life-cycle carbon approach to minimise both upfront and in use embodied carbon emissions. It achieves

the GLA standard benchmark for commercial buildings which is recognised as a challenge for a tall building typology. The proposal would achieve high energy efficiency standards through passive design measures, this is demonstrated in targeting an ambitious NABERS UK rating of 5.5 stars. The proposal is considered to be in overall compliance with London Plan policy SI 2, SI 7, Local Plan policy CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

981. The application site is considered appropriate in principle for a tall building and a full assessment of the proposal against London Plan policy D9 is set out above, which concludes the policy would be complied with; the proposal would comply with the various requirements of Local Plan policy CS 14 and most relevant parts of emerging City Plan policies S12 and S21, although there would be some minor conflict with the emerging City Plan 2040 S12 (3) in relation to the highest point of the scheme, which is slightly above the draft proposed Cluster contour lines in this location, and with S21 (5) in relation to the impacts on designated heritage assets which have been identified.
982. The proposals comply with London Plan Policy HC4, Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 and associated guidance in the LVMF SPG and Protected Views SPD. In LVMF pan-London panoramas the development would consolidate and enhance the visual appearance of the City Cluster on the skyline.
983. The development would preserve the experiences from public high-level viewing platforms including from Monument, St Paul's Cathedral Stone and Golden Galleries. However it would impact the westerly views from Sky Garden at 20 Fenchurch Street, but this would be entirely mitigated by the new public roof garden proposed at level 35, which would reinstate these viewing experiences.
984. The proposal would not harm the attributes or components of the Outstanding Universal Value, Significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with Local Plan Policy CS12, CS13 (3) Emerging City Plan Policy S11, HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG.
985. The proposal would, via change in their settings, cause a low level of less than substantial harm to The Monument (grade I); a low level of less than substantial



harm to Tower Bridge (grade I) and slight level of less than substantial harm (at the lowest end of the spectrum) to the Eastcheap Conservation Area, as it would fail to preserve the significance/special interest or setting of these two designated heritage assets, there would be conflict with Local Plan policies, CS12 (1 and 2), DM12.1 (1), emerging City Plan S 11 (2) and London Plan HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies. The proposals would otherwise comply with Local Plan policies CS 12 (2-5) CS13, CS14 and DM12.1 (2-5) DM12.5 emerging City Plan 2040 S11 (1,3-5) S 13, Policies HE1 and London Plan HC 1 (A, B, C and D), HC2, HC3 and HC4. As set out above in the report, these harms would be outweighed by the public benefits of the proposal.

986. The proposal would be a striking new addition to the Cluster and would be of a dynamic and distinctive architectural character, with full details of its innovative 'fin' façade system to the south-east areas of the tower secured through S.106 obligation., Officers consider that the architectural design of the building would be a well-layered and unique piece of design which expands London's public realm and urban greening. This level of urban greening has been carefully integrated into the design of the building and would enable it to make a significant beneficial contribution to the landmark qualities of the building, befitting the pivotal location of the site at the western edge of the emerging City Cluster, in addition to the inclusion of the Undercroft as a new piece of the public realm (from 7am to 11pm), which is also considered a benefit of the scheme. This is in accordance with London Plan policies Local Plan Policies CS10, DM10.1, DM10.3, DM10.4, DM10.8 and DM19.1 emerging City Plan Policies S1, S8, DE2-8, HL1, and London Plan Policies D3, D4 and D8, and relevant sections of the NPPF. The proposals would constitute Good Growth by design and be in accordance with Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 DE2 London Plan D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5,6.
987. It is the view of officers that as a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 complied with, and as London Plan policy D9, and Local Plan policy CS10 (Design), CS13 (Protected Views) are complied with, that notwithstanding the conflict with CS12 (Historic Environment), DM12.1 Managing Change affecting all heritage assets and spaces), emerging City Plan Policies 2040 S11 (Historic Environment), S12 (3) (Tall Buildings), and London Plan HC1 ( Heritage Conservation and Growth ) , the proposals comply with the development plan when considered as a whole.

988. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the S.106 agreement. Together these would go some way to mitigate the impact of the proposal.
989. 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.
990. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
991. Paragraph 10 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.
992. 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).
993. 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.
994. National Planning Guidance advises that conflict between development plan policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs as guided by the NPPF.
995. 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**

### **JULY 2024 SUBMISSION**

- Completed Application Form, submitted via the planning portal
- Additional CIL Information Form
- Architectural Drawings and Drawing Schedule, prepared by 3XN
- Design and Access Statement, prepared by 3XN
- Cover Letter, prepared by DP9
- Air Quality Positive Statement, prepared by Air Quality Consultants
- Archaeological Desk Based Assessment, prepared by MOLA
- Aviation Safeguarding Assessment, prepared by KLG
- Biodiversity Net Gain Assessment, prepared by Assystem
- Circular Economy Statement, prepared by Arup
- Cultural Strategy, prepared by Futurecity
- Economic Benefits Statement, prepared by Trium
- Energy Statement, prepared by Arup
- Equalities Statement, prepared by Trium
- External Lighting Statement, prepared by atelier ten
- Fire Statement, prepared by Arup
- Flood Risk Assessment, prepared by Arup
- Health Impact Assessment, prepared by Trium
- Landscape Plans, prepared by Townshend Landscape Architects
- Landscape Statement, prepared by Townshend Landscape Architects
- Operational Waste Management Strategy, prepared by Velocity
- Outdoor Thermal Comfort Assessment, prepared by RWDI
- Outline Construction Environmental Management Plan, prepared by TCCL
- Outline Construction Logistics Plan, prepared by Velocity
- Outline Cycle Promotion Plan, prepared by Velocity
- Outline Delivery and Servicing Plan, prepared by Velocity

- Phase 1 Contamination Report (Ground Contamination Preliminary Risk Assessment), prepared by Arup
- Planning Statement, prepared by DP9
- Radiance Based Impact Assessment, prepared by GIA
- Social Value Statement, prepared by Trium
- Statement of Community Involvement, prepared by JBP Associates
- Structural Report, prepared by Arup
- Sustainability Statement, prepared by Arup
- Transport Assessment, prepared by Velocity
- Utility Statement, prepared by Arup
- Ventilation and Extraction Statement, prepared by Arup
- Whole Life-Cycle Carbon Assessment, prepared by Arup

#### **Environmental Statement**

- Volume 1: Environmental Statement Main Report
  - i. Chapter 1: Introduction, prepared by Trium
  - ii. Chapter 2: EIA Methodology, prepared by Trium
  - iii. Chapter 3: Alternatives and Design Evolution, prepared by Trium
  - iv. Chapter 4: The Proposed Development, prepared by Trium
  - v. Chapter 5: Demolition and Construction, prepared by Trium
  - vi. Chapter 6: Air Quality, prepared by Air Quality Consultants
  - vii. Chapter 7: Noise and Vibration, prepared by Sandy Brown
  - viii. Chapter 8: Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, prepared by GIA
  - ix. Chapter 9: Wind Microclimate, prepared by Arup
  - x. Chapter 10: Climate Change, prepared by Trium and Air Quality Consultants
  - xi. Chapter 11: Effect Interactions, prepared by Trium
  - xii. Chapter 12: Likely Significant Effects and Conclusions, prepared by Trium

- xiii. Chapter 13: Environmental Management, Mitigation and Monitoring Schedule, prepared by Trium
- Volume 2: Heritage, Townscape and Visual Impact Assessment, prepared by The Townscape Consultancy
- Volume 3: Technical Appendices
  - Appendix: Introduction
    - i. Annex 1: EIA Statement of Competent Experts, prepared by Trium
    - ii. Annex 2: Location of Information within the ES, prepared by Trium
    - iii. Annex 3: Glossary, prepared by Trium
  - Appendix: EIA Methodology, prepared by Trium
    - i. Annex 1: EIA Scoping Report
    - ii. Annex 2: Informal CoL Feedback on Cumulative Schemes
    - iii. Annex 3: Cumulative Schemes Map and List
  - Appendix: Air Quality, prepared by Air Quality Consultants
    - i. Annex 1: Glossary
    - ii. Annex 2: Legislative and Planning Policy Context
    - iii. Annex 3: EPUK & IAQM Planning for Air Quality Guidance
    - iv. Annex 4: Roads Modelling Methodology
    - v. Annex 5: Professional Experience
    - vi. Annex 6: Construction Mitigation
    - vii. Annex 7: Preliminary Air Quality Assessment
    - viii. Annex 8: References
  - Appendix: Noise and Vibration, prepared by Sandy Brown
    - i. Annex 1: Legislative, Planning Policy and Other Relevant Standard and Guidance
    - ii. Annex 2: Glossary
    - iii. Annex 3: Vibration Survey and Assessment Report
    - iv. Annex 4: Environmental Noise Survey Report
    - v. Annex 5: Construction Plant Assumptions
    - vi. Annex 6: Traffic Data

- vii Annex 7: Vibration Survey Consultation
- Appendix: Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, prepared by GIA
  - i. Annex 1: Legislative and Planning Policy Context
  - ii. Annex 2: Baseline and Methodology
  - iii. Annex 3: Drawings
  - iv. Annex 4: Daylight and Sunlight Results
  - v. Annex 5: Window Maps
  - vi. Annex 6: Overshadowing Results
  - vii. Annex 7: Solar Glare Assessment
  - viii. Annex 8: Light Trespass Assessment
  - ix. Annex 9: Radiance-Based Daylight Assessment
- Appendix: Wind Microclimate, prepared by RWDI
  - i. Annex 1: Policy and Guidance
  - ii. Annex 2: Technical Appendix: Wind Tunnel
  - iii. Annex 3: Technical Appendix: CFD Methodology and Assessment
- Appendix: Climate Change
  - i. Annex 1: Legislation, Policy and Guidance, prepared by Air Quality Consultants
  - ii. Annex 2: Extract from Whole Life-Cycle Carbon Assessment, prepared by Air Quality Consultants
  - iii. Annex 3: Extract from Energy Statement, prepared by Air Quality Consultants
  - iv. Annex 4: London Travel Demand Survey 2022/23, prepared by Air Quality Consultants
  - v. Annex 5: Climate Change Technical Note, prepared by Trium

## **OCTOBER 2024 SUBMISSION**

- Updated Application Form
- Updated Additional CIL Information Form

- Cover Letter, prepared by DP9
- Design & Access Statement Addendum Report, prepared by 3XN
- Biodiversity Net Gain Calculations (Updated), prepared by Assystem
- Circular Economy Statement Addendum, prepared by Arup
- Economic Benefits Statement addendum, prepared by Trium
- Energy Statement (Updated), prepared by Arup
- Equalities Statement addendum, prepared by Trium
- External Lighting Statement (Updated), prepared by atelier ten
- Façade and Access Maintenance, prepared by Arup
- Fire Statement Addendum, prepared by Arup
- Health Impact Assessment addendum, prepared by Trium
- Heritage Impact Assessment – Tower of London, prepared by The Townscape Consultancy
- Landscape Plans, prepared by Townshend Landscape Architects
- Outline Construction Environmental Management Plan, prepared by TCCL
- Radiance Based Impact Assessment – Updated Report, prepared by GIA
- Social Value Statement Addendum, prepared by Trium
- Sustainability Statement Addendum, prepared by Arup
- Thermal Comfort Assessment addendum, prepared by RWDI
- Transport Addendum Report, prepared by Velocity
- Whole Life-Cycle Carbon Assessment Addendum, prepared by Arup

### **Environmental Statement Addendum**

- Volume 1: Main Report
  - i. Chapter 1: Introduction, Proposed Design Amendments and ES Addendum Approach, prepared by Trium
  - ii. Chapter 8: Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, prepared by GIA
  - iii. Chapter 9: Wind Microclimate, prepared by Arup
  - iv. Chapter 12: Summary and Conclusions, prepared by Trium

- Volume 2: Heritage, Townscape and Visual Impact Assessment Addendum Report, prepared by The Townscape Consultancy
- Volume 3: Technical Appendices
  - Appendix: Introduction, Proposed Design Amendments and ES Addendum Approach
    - i. Annex 1: Cumulative Schemes List and Map, prepared by Trium
  - Appendix: Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, prepared by GIA
    - i. Annex 1: Legislative and Planning Policy Context
    - ii. Annex 2: Baseline and Methodology
    - iii. Annex 3: Drawings
    - iv. Annex 4: Daylight and Sunlight Results
    - v. Annex 5: Window Maps
    - vi. Annex 6: Overshadowing Results
    - vii. Annex 7: Solar Glare Assessment
    - viii. Annex 8: Light Trespass Assessment
    - ix. Annex 9: Radiance-Based Daylight Assessment
  - Appendix: Wind Microclimate
    - i Annex 3: Technical Appendix: CFD Methodology and Assessment
- Environmental Statement Addendum: Non-technical Summary, prepared by Trium

**Additional information**

- Review of daylight, sunlight, overshadowing, solar glare and light spillage assessment (dated 16.10.2024), prepared by BRE
- Review of daylight, sunlight, overshadowing, solar glare and light spillage assessment (dated 08.11.2024), prepared by BRE



- Environmental Statement Addendum – Volume Three: Technical Appendices
- RIBA Stage 2 Adaptation to Climate Change Workshop, prepared by Arup
- Applicant response to Thames Water, 19.11.2024
- Overview of Ongoing Engagement prepared by Jbp, issued on 22.11.2024

## Representations/Consultation Responses

### External

23.07.2024	Email	Health and Safety Executive
26.07.2024	Email	Crossrail Safeguarding
26.07.2024	Email	NATS Safeguarding
26.07.2024	Email	London Underground/DLR Infrastructure Protection
26.07.2024	Letter	Natural England
29.07.2024	Letter	Environment Agency
01.08.2024	Letter	Historic England
05.08.2024	Letter	Westminster City Council
07.08.2024	Letter	Heathrow Airport Limited
09.08.2024	Email	Thames Water
09.08.2024	Email	Thames Water
09.08.2024	Letter	London City Airport
12.08.2024	Letter	Historic England
14.08.2024	Letter	London Borough of Tower Hamlets
19.08.2024	Letter	Historic Royal Palaces
28.08.2024	Letter	Transport For London
09.09.2024	Letter	Southwark Council
23.09.2024	Letter	Surveyor To The Fabric – St. Paul's Cathedral
09.10.2024	Letter	Royal Borough Of Greenwich
22.10.2024	Email	NATS Safeguarding
22.10.2024	Email	Health And Safety Executive
23.10.2024	Email	Thames Water
23.10.2024	Letter	London City Airport
23.10.2024	Letter	Environment Agency
24.10.2024	Letter	Heathrow Airport Limited
25.10.2024	Email	Crossrail Safeguarding
04.11.2024	Email	Natural England
05.11.2024	Email	Historic England
06.11.2024	Letter	Westminster City Council
15.11.2024	Letter	Southwark Council
19.11.2024	Email	Surveyor To The Fabric – St. Paul's Cathedral
20.11.2024	Email	Thames Water
20.11.2024	Email	London Borough of Thames Hamlets

20.11.2024 Email Historic England

### **Internal**

23.07.2024 Email Chairman – Planning And Transportation  
Committee  
01.08.2024 Letter Lead Local Flood Authority  
07.08.2024 Email Air Quality Officer  
13.08.2024 Email Strategic Infrastructure And Highways Asset  
Manager  
21.08.2024 Email Air Quality Officer  
27.09.2024 Letter Environmental Health Officer  
07.10.2024 Letter Air Quality Officer  
10.10.2024 Email Access Advisor  
23.10.2024 Letter Planning Obligations  
28.10.2024 Letter District Surveyor's Officer  
30.10.2024 Letter Planning Obligations  
31.10.2024 Letter City Operations Division (on behalf of Thames  
Water)

### **Representations Members of the Public**

21.08.2024 Comment (Neutral) CMS Cameron McKenna Nabarro  
Olswang LLLP  
21.08.2024 Comment (Neutral) Mr Christopher Bowes  
23.10.2024 Comment (Objection) Peter Rose  
24.11.2024 Comment (Objection) Jude Goffe

## **Appendix A**

### **REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS**

#### **Reasoned Conclusions**

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

The Environmental Statement (ES) provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, health, highways & transport, noise & vibration, air quality, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual, climate change, greenhouse gas emissions, waste and cumulative effects. The ES Addendum submitted under Regulation 25 of the EIA Regulations addresses the proposed amendments contained within the submission and sets out additional assessment of daylight, sunlight, overshadowing, solar glare and light trespass effects and wind microclimate effects. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES, ES Addendum and further and other information, and as, where relevant, referred to in the report.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely office, flexible retail / café, learning space and elevated public spaces / amenity spaces. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change to other uses specified within Class E.

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

#### **Monitoring Measures**

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with Demolition and Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, Management Plans of the public spaces, a Publics Lift Maintenance Strategy and a Travel Plan (including a Cycling Promotion Plan and Accessible Car Parking Management Plan). Mitigation measures should be secured including wind mitigation to the level 34 and 35 terraces. These as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S.106 agreement, recommended conditions and the S.278 agreement. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

## **Appendix B**

### **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 D10 Basement Development
- 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 E3 Affordable Workspaces
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- 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 HC6 Supporting the night-time economy
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy S11 Improving air quality
- Policy S12 Minimising greenhouse gas emissions
- Policy S13 Energy Infrastructure
- Policy S14 Managing heat risk
- Policy S15 Water Infrastructure
- Policy S16 Digital connectivity Infrastructure
- Policy S17 Reducing waste and supporting the circular economy
- Policy S18 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage

- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- 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**

- 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)

### **Emerging City Plan 2040**

- Emerging Strategic Policy S1: Health and Inclusive City
- Emerging Policy HL1: Inclusive buildings and spaces
- Emerging Policy HL2: Air quality
- Emerging Policy HL3: Noise
- Emerging Policy HL4 Contaminated land and water quality
- Emerging Policy HL5: Location and protection of social and community facilities
- Emerging Policy HL6: Public Toilets
- Emerging Policy HL7 Sport and Recreation
- Emerging Policy HL8 Play areas and facilities
- Emerging Policy HL9: Health Impact Assessment (HIA)
- Emerging Strategic Policy S2: Safe and Secure City
- Emerging Policy SA1: Publicly accessible locations
- Emerging Policy SA2 Dispersal Routes
- Emerging Policy SA3: Designing in Security
- Emerging Strategic Policy S3: Housing
- Emerging Policy HS3: Residential Environment
- Emerging Strategic Policy S4: Offices
- Emerging Policy OF1: Office Development

- Emerging Policy OF2: Protection of Existing Office Floorspace
- Emerging Policy OF3 Temporary 'Meanwhile' Uses
- Emerging Strategic Policy S5 Retail and Active Frontages
- Emerging Policy RE2 Active Frontages
- Emerging Strategic Policy S6: Culture and Visitors
- Emerging Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Emerging Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Emerging Policy CV3: Provision of Visitor Facilities
- Emerging Policy CV5 Evening and Night-Time Economy
- Emerging Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Emerging Policy N1 Infrastructure Provision and Connection
- Emerging Policy IN1: Infrastructure Capacity
- Emerging Strategic Policy S8: Design
- Emerging Policy DE1: Sustainable Design
- Emerging Policy DE2: Design Quality
- Emerging Policy DE3: Public Realm
- Emerging Policy DE4: Terraces and Elevated Public Spaces
- Emerging Policy DE5 Shopfronts
- Emerging Policy DE6 Advertisements
- Emerging Policy DE7: Daylight and Sunlight
- Emerging Policy DE8: Lighting
- Emerging Strategic Policy S9: Transport and Servicing
- Emerging Policy VT1: The impacts of development on transport
- Emerging Policy VT2 Freight and Servicing
- Emerging Policy VT3: Vehicle Parking
- Emerging Policy VT5: Aviation Landing Facilities
- Emerging Strategic Policy S10: Active Travel and Healthy Streets
- Emerging Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Emerging Policy AT2: Active Travel including Cycling
- Emerging Policy AT3: Cycle Parking
- Emerging Strategic Policy S11: Historic Environment
- Emerging Policy HE1: Managing Change to Historic Environment
- Development
- Emerging Policy HE2: Ancient Monuments and Archaeology
- Emerging Policy HE3: Setting of the Tower of London World Heritage Site
- Emerging Strategic Policy S12: Tall Buildings
- Emerging Strategic Policy S13: Protected Views
- Emerging Strategic Policy S14: Open Spaces and Green Infrastructure
- Emerging Policy OS2: City Urban Greening
- Emerging Policy OS3: Biodiversity
- Emerging Policy OS4: Biodiversity Net Gain
- Emerging Policy OS5 Trees
- Emerging Strategic Policy S15: Climate Resilience and Flood Risk
- Emerging Policy CR1: Overheating and Urban Heat Island Effect
- Emerging Policy CR3 Sustainable Drainage Systems (SuDs)

- Emerging Policy CR4 Flood Protection and Flood Defences
- Emerging Policy CE1 Sustainably Waste Facilities and Transport
- Emerging Strategic Policy S16: Circular Economy and Waste
- Emerging Strategic Policy S21: City Cluster
- Emerging 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
- 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,
- Protected Views SPD, January 2012
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014)

### **Relevant Local Plan Policies**

#### ***CS1 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.

### ***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.

### ***CS14 Tall Buildings***

To allow tall buildings of world class architecture and sustainable and accessible 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, by:

1. Permitting tall buildings on suitable sites within the City's Eastern Cluster.
2. Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Paul's Heights area; St. Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.
3. 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.

4. Ensuring that tall building proposals do not adversely affect the operation of London's airports.

***CS15 Sustainable development and climate change***

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

***CS16 Public transport, streets and walkways***

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

***CS17 Waste***

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

***CS18 Flood risk***

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

***CS19 Open Spaces and Recreation***

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

***CS20 Retailing***

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

***CS21 Housing***

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

***CS22 Social infrastructure and opportunity***

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

***DM1.3 Small and medium business units***

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

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

***DM1.5 Mixed uses in commercial areas***

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

***DM2.1 Infrastructure provision***

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

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

- 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;
- reasonable gas and water supply considering the need to conserve natural resources;
- 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;
- 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;
- 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.

***Policy DM 3.1 Self-containment in mixed use developments***

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:

- 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 retrofit 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.

***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:

- conducting a full risk assessment;
- keeping access points to the development to a minimum;
- 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;
- ensuring early consultation with the City of London Police on risk mitigation measures;
- 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:

- consulting the City Corporation on all matters relating to servicing;
- restricting motor vehicle access, where required;
- implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- 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:

- 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.

#### ***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:

- 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;
- all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- appropriate, high quality and durable materials are used;
- the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- 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;
- 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;

- 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;
- 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;
- there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- 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;
- there is provision of amenity space, where appropriate;
- 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:

- immediately overlook residential premises;
- adversely affect rooflines or roof profiles;
- result in the loss of historic or locally distinctive roof forms, features or coverings;
- 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:

- the predominant use of the space, surrounding buildings and adjacent spaces;
- connections between spaces and the provision of pleasant walking routes;
- the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;

- 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;
- the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- the use of high quality street furniture to enhance and delineate the public realm;
- lighting which should be sensitively co-ordinated with the design of the scheme.

#### ***Policy DM 10.5 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:

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

#### ***Policy DM 10.6 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:

- inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- 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:

- protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- ensuring that financial provision is made for the future maintenance of new public art;
- 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.



#### ***DM12.4 Ancient monuments and 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:
  - BREEAM or Code for Sustainable Homes pre-assessment;
  - an energy statement in line with London Plan requirements;
  - 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:
  - energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
  - carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
  - 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;

- 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 onsite 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 onsite 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:

- road dangers;
- pedestrian environment and movement;
- cycling infrastructure provision;
- public transport;
- the street network.

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

### ***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.

#### ***Policy DM 16.6 Public car parks***

No new public car parks will be permitted in the City, including the temporary use of vacant sites. The redevelopment of existing public car parks for alternative land uses will be encouraged where it is demonstrated that they are no longer required.

#### ***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:

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

#### ***DM18.1 Development in Flood Risk Area***

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

- the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
- the benefits of the development outweigh the flood risk to future occupants;

- the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
    - all sites within the City Flood Risk Area as shown on the Policies Map; and
    - all major development elsewhere in the City.
  3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.
  4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
  5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
  6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

#### ***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.

#### ***Policy DM 18.3 Flood protection and climate change resilience***

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.

#### ***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:

- be publicly accessible where feasible; this may be achieved through a legal agreement;
  - provide a high quality environment;
  - incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
  - have regard to biodiversity and the creation of green corridors;
  - 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:

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

***DM 20.4 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 1,000m<sup>2</sup>) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

***DM 22.1 Location and protection of social and community facilities***

1. To resist the loss of social and community facilities unless:
  - replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
  - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
  - 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:
  - where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
  - in locations which are convenient to the communities they serve;

- in or near identified residential areas, providing their amenity is safeguarded;
  - as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
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.

***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

***DM 22.2 Provision of public toilets***

A widespread distribution of public toilets which meet public demand will be provided by:

- requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
- taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.



## SCHEDULE

**APPLICATION: 24/00743/FULEIA**

**Allianz House 60 Gracechurch Street London EC3V 0HR**

Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

Re-consultation due to amendments.

### CONDITIONS

1.	<p><b>Time limit</b></p> <p>The development hereby permitted shall be begun before the expiration of three years from the date of this permission.</p> <p>REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.</p>
<b>Environmental Health</b>	
2.	<p><b>Scheme of Protective Works – pre-demolition</b></p> <p>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</p>

	<p>accordance with the approved scheme (including payment of any agreed monitoring contribution).</p> <p>REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.</p>
3.	<p><b>Scheme of Protective Works – pre-construction</b></p> <p>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).</p> <p>REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to construction in order that the impact on amenities is minimised from the time that the construction starts.</p>
4.	<p><b>Opening hours – terraces</b></p> <p>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 and not at any time on Sundays or Bank Holidays, other than in the case of emergency.</p> <p>REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p>

5.	<p><b>Amplified music</b></p> <p>No amplified or other music shall be played on the roof terraces.</p> <p>REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p>
6.	<p><b>Plant noise</b></p> <p>(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the plant is or may be in operation.</p> <p>(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.</p> <p>REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p>
7.	<p><b>Sound insulation office/non-office</b></p> <p>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.</p> <p>A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall submitted to and approved in writing by the Local Planning Authority.</p> <p>REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.</p>

8.	<p><b>Fume extract arrangements</b></p> <p>Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the proposed café/bar 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.</p> <p>REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.</p>
9.	<p><b>Mounting of plant</b></p> <p>Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.</p> <p>REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.</p>
10.	<p><b>Contamination</b></p> <p>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 'Land Contamination Risk Assessment Management Guidance'.</p> <p>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.</p>

	<p>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.</p> <p>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.</p>
11.	<p><b>Contamination</b></p> <p>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 'Contamination Risk Assessment Management Guidance'. 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.</p> <p>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.</p> <p>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.</p>
<b>SuDS / Water</b>	
12.	<b>SuDS</b>

	<p>Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <p>(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 4.5 l/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 715 m<sup>3</sup>;</p> <p>(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.</p> <p>(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.</p> <p>REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.</p>
13.	<p><b>SuDS Maintenance</b></p> <p>Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <p>(a) A Lifetime Maintenance Plan for the SuDS system to include:</p> <ul style="list-style-type: none"> <li>• A full description of how the system would work, it's aims and objectives and the flow control arrangements;</li> <li>• A Maintenance Inspection Checklist/Log;</li> <li>• A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.</li> </ul> <p>REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.</p>

<p>14.</p>	<p><b>Thames Water – Piling method statement (waste)</b></p> <p>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.</p> <p>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.</p>
<p>15.</p>	<p><b>Thames Water – Construction near water main</b></p> <p>No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.</p> <p>REASON: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. 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.</p>
<p>16.</p>	<p><b>Thames Water – Piling method statement (water)</b></p> <p>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,</p>

	<p>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.</p> <p>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.</p>
17.	<p><b>Thames Water – Water network</b></p> <p>No development shall be occupied until confirmation has been provided that either:</p> <ul style="list-style-type: none"> <li>(a) all water network upgrades required to accommodate the additional demand to serve the development have been completed; or</li> <li>(b) a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied.</li> </ul> <p>Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.</p> <p>REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.</p>
<b>Archaeology</b>	
18.	<p><b>Written Scheme of Investigation</b></p> <p>No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and:</p> <ul style="list-style-type: none"> <li>(a) The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</li> </ul>



	<p>(b) Where appropriate, details of a programme for delivering related positive public benefits</p> <p>(c) The programme for post-investigation assessment and subsequent analysis, publication &amp; dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.</p> <p>All works shall be undertaken in accordance with the approved WSI.</p> <p>REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.</p>
<b>Aviation</b>	
19.	<p><b>Radar Mitigation Scheme</b></p> <p>No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.</p> <p>REASON: In the interest of aircraft safety and the operations of London City Airport, Heathrow Airport, and NATS En-route PLC.</p>
20.	<p><b>Radar Mitigation Scheme Implementation</b></p> <p>No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.</p> <p>REASON: In the interest of aircraft safety and the operations of London City Airport, Heathrow Airport, and NATS En-route PLC.</p>
21.	<p><b>Crane Operation Plan</b></p> <p>No construction work shall commence on site until the Developer has agreed a “Crane Operation Plan” which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the “Radar Operator”. Construction at the site shall only thereafter be operated in accordance with the approved “Crane Operation Plan”.</p>

	REASON: In the interest of aircraft safety and the operations of London City Airport, Heathrow Airport, and NATS En-route PLC.
22.	<p><b>Permanent Obstacle Lighting Scheme</b></p> <p>Obstacle lights shall be placed on all corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.</p> <p>REASON: In the interest of aircraft safety and the operation of London City Airport.</p>
<b>Wind mitigation</b>	
23.	<p>No development other than any demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.</p> <p>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.</p>
<b>Sustainability</b>	
24.	<p><b>Circular Economy</b></p> <p>Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, including an end of life strategy, 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 should include the approach to disassembly of building elements and the</p>

	<p>approach to storing detailed material specification and building information relating to the structure and materials of the new building. The development shall be carried out in accordance with the approved details and operated &amp; managed in accordance with the approved details throughout the lifecycle of the development.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance London Plan policies D3, SI 7, SI 8; Local Plan 2015 policies CS17, DM 17.2; and emerging City Plan 2040 S16 and DE1.</p>
25.	<p><b>Post-construction Circular Economy</b></p> <p>No later than 3 months after completion of the building, a post-construction Circular Economy Statement, including the approaches to disassembly of building elements and to storing detailed material specifications and building information relating to the structure and materials of the new building 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. The statement shall also be submitted to the GLA at: <a href="mailto:circulareconomystatements@london.gov.uk">circulareconomystatements@london.gov.uk</a>.</p> <p>REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with London Plan policies D3, SI 7, SI 8; Local Plan 2015 policies CS17, DM 17.2; and emerging City Plan 2040 policies S16 and DE1.</p>
26.	<p><b>Whole life-cycle carbon emissions</b></p> <p>Prior to the commencement of the development, excluding demolition, after RIBA stage 4, an update to the approved 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 of the development are on track to achieve at least the GLA's Standard Benchmark ( as current at the time of planning decision and to the same methodology) 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.</p>

	<p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development in accordance with London Plan policies SI 2, SI 7; Local Plan policies CS 17, DM 15.2, and emerging City Plan 2040 policies S8 and DE1.</p>
27.	<p><b>Post-construction whole life-cycle carbon emissions</b></p> <p>Once the as-built design has been completed (upon commencement of RIBA Stage 6) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide details of the whole life-cycle carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received no later than 6 months post as-built design completion, unless otherwise agreed. The assessment shall also be submitted to the GLA at: <a href="mailto:ZeroCarbonPlanning@london.gov.uk">ZeroCarbonPlanning@london.gov.uk</a></p> <p>REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with London Plan policies SI 2, SI 7; Local Plan policies CS 15, CS 17, DM 15.2, and emerging City Plan 2040 policies S8 and DE1.</p>
28.	<p><b>Façade System</b></p> <p>Prior to the commencement of the development, excluding demolition, details of the façade system confirming the detailed design in relation to reducing the embodied and operational carbon impact and waste across all life-cycle stages that would result from the proposed facade type, materials, construction method and replacement cycles, is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings.</p> <p>REASON: To demonstrate that whole life-cycle carbon emissions have been minimised and that the development is sustainable in accordance with London Plan policies SI 2, SI 7; Local Plan policies CS 15, CS 17, DM 15.2, and emerging City Plan 2040 policies S8 and DE1.</p>
29.	<p><b>District Heating Network connection</b></p> <p>The development shall be designed to allow for the retrofit of heat exchanger rooms to connect into a district heating network if this</p>

	<p>becomes available during the lifetime of the development. This is to include the allocation of plant space and a protected route for connection in and out of the site.</p> <p>REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network in accordance with Local Plan policies DM15.1, DM15.2, DM15.3, DM15.4 and emerging City Plan 2040 policy DE1.</p>
30.	<p><b>Climate change resilience measures – completion details</b></p> <p>Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.</p> <p>REASON: To comply with Local Plan Policy DM 15.5 and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.</p>
31.	<p><b>BREEAM</b></p> <p>A post construction BREEAM assessment for the office use and separately for the Sui Generis use, demonstrating that a target rating of 'Outstanding' has been achieved (or a minimum rating of 'Excellent' 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.</p> <p>REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan policy DE1.</p>
32.	<p><b>Updated Biodiversity Net Gain</b></p> <p>Prior to the commencement of development excluding demolition, an updated Biodiversity Net Gain Assessment shall be submitted to and approved to the Local Planning Authority to reflect any changes to landscaping proposals at detailed stage.</p>

	<p>REASON: To comply with Local Plan policy DM 19.2 Biodiversity and urban greening, taking into account any changes which may have occurred throughout the detailed design.</p>
33.	<p><b>Habitat Management and Monitoring Plan</b></p> <p>Prior to the commencement of the development, excluding demolition, a Habitat Management and Monitoring 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 and management. This shall include the following:</p> <ul style="list-style-type: none"> <li>• details of ecological landscaping, along with associated management and monitoring</li> <li>• detailed locations/specifications of boxes for swift/house sparrow/bats shall be provided</li> <li>• details of habitat created for solitary bees</li> <li>• details of habitat created for stag beetles (or robust justification for its exclusion) shall be provided</li> <li>• build up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible).</li> </ul> <p>The measures as set out in the approved plan shall be carried out and maintained in perpetuity.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening.</p>
34.	<p><b>Post Construction UGF and BNG</b></p> <p>Within 6 months of completion details of the measures to meet the approved Urban Greening Factor of 0.33 and the Biodiversity Net Gain score of 0.45, to include plant and habitat species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening, emerging City Plan policy OS2 and London Plan Policy G5.</p>
<b>Design / Public Realm</b>	
35.	<p><b>Design</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority</p>

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 details of compliance with the approved Circular Economy Strategy, and inclusive access management plan;
- (b) construction of 1:1 sample material and facade panels of agreed sections of the facades;
- (c) detailed drawings of a scale no less than 1:20, in plan, section and elevation of agreed typical bays, including reference to materials, finishes, lighting, details of jointing, and drip details, and any necessary expansion/movement joints;
- (d) Notwithstanding the approved drawings for the Undercroft and the Journey passage, 1:20 detailed drawings in plan, section and elevation, in addition to material specification and finishes, of all internal elevations, including soffits;
- (e) Details of the new ground and first-floor elevations including all entrances and door design, clear glazing, column face pattern and texture, soffits, integrated art panels, and information boards;
- (f) Full details of terraces, including all elevations, layouts, entrance design and location, fenestration, planters, seating, lighting, soffits, drainage, irrigation, balustrades and any other infrastructure required, demonstrating adequate microclimatic mitigation has been considered where necessary;
- (g) Details of walls, railings, balustrades, ramps, gates, screens, handrails etc, bounding or within the site;
- (h) 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;
- (i) details of the integration of M&E and building services into the external envelope, including but not limited to, details of external ducts, vents, louvres and extracts;
- (j) details of all new service vehicle, fire escape and cycle store entrances;
- (k) details of all external signage for all aspects of the building;

	<p>(l) details of access to the roof for cleaning and maintenance, including details of mansafe equipment;</p> <p>(m) notwithstanding the approved drawings, full details of the rooftop including any plant equipment and the roofscape;</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2 and emerging policies DE2, DE6 and HE1 of the Emerging City Plan 2040.</p>
36.	<p><b>Suicide Prevention</b></p> <p>Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for the external terrace areas and other raised areas along with the associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM3.2 DM10.1 and DM12.2.</p>
37.	<p><b>Landscaping</b></p> <p>Before any works thereby affected are begun the following details, plans, and relevant drawings, relating to all surfaces pertaining to the public realm and access to it (the Undercroft, passageway and publicly accessible roof garden); and private terraces/balconies, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <p>(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 and local habitat;</p> <p>(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;</p>



	<ul style="list-style-type: none"> <li>(c) details of all SuDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement irrigation;</li> <li>(d) details of the method of irrigation and nutrient delivery systems for all soft landscaped areas;</li> <li>(e) details of all urban furniture, including planters, seating, refuse bins, biodiversity habitat structures, and HVM;</li> <li>(f) details of all hard landscaping materials, including street paving details and samples, and hard surfaces within the Undercroft (including but not limited to, tactile paving and the ground level demarcation of the Blue Badge parking bay) in accordance with the City Public Realm Technical Manual;</li> <li>(g) details of landscape lighting for plant health within the Undercroft;</li> <li>(h) details of the Landscape management and maintenance plan (LMMP) for all soft and hard landscaping and street furniture for all proposed landscaping.</li> </ul> <p>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 and must be maintained in perpetuity in accordance with the approved LMMP. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance, and 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: DM3.2, DM10.1, DM10.5, DM12.2, DM18.2, DM19.2 and policies DE2, DE6 and HE1 of the emerging City Plan 2040</p>
38.	<p><b>Lighting Strategy</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>(a) Lighting layout/s;</li> </ul>

	<ul style="list-style-type: none"> <li>(b) Details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);</li> <li>(c) A lighting control methodology;</li> <li>(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;</li> <li>(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;</li> <li>(f) Details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.</li> </ul> <p>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.</p> <p>All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM 15.7 , CS15.</p>
<b>Accessibility</b>	
39.	<p><b>Signage and wayfinding</b></p> <p>Before the shell and core is complete, excluding demolition, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, inclusive and accessible routes and facilities, cycle parking, cultural uses and any other relevant uses or historic sites shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.</p>

40.	<p><b>Public toilets</b></p> <p>Before any construction works hereby permitted are begun details, including drawings at a scale of no less than 1:20 shall be submitted to and approved in writing by the local planning authority of:</p> <ul style="list-style-type: none"> <li>(a) the WC facilities at ground floor level within the building hereby approved; and</li> <li>(b) associated signage.</li> </ul> <p>The approved WC facilities shall be made available to the general public at all times of the operation of the building and be free of charge for the lifetime of the development. The signage informing the general public of the public toilet facilities onsite, shall be installed concurrently with the first operation of the building and be retained as such for the lifetime of the development.</p> <p>REASON: To ensure the provision of public toilet facilities to meet the needs of the public in accordance with Policy DM22.2 of the Local Plan.</p>
41.	<p><b>Inclusion and accessibility</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ul style="list-style-type: none"> <li>(a) All surface materials including details of slip resistance, contrast, colour, texture and acoustic properties, as appropriate</li> <li>(b) Details of wider aisle gates at all controlled points of entry</li> <li>(c) Details of planting and maintenance for areas of landscape including how unwelcome touch and scent can be avoided</li> <li>(d) Glare analysis for cladding materials</li> <li>(e) An inclusive entrances strategy with details of controlled entry systems, entrance doors, thresholds, mat materials, contrast and manifestations with drawings at a scale of no less than 1:20 (as relevant)</li> <li>(f) Details and specification for all lifting devices including doors, widths, control panels, floor surfaces, means of operation and internal car dimensions</li> <li>(g) Details of the amphistair to show recesses for wheelchair users, buggies and assistance animals, handrails, arm rests and back supports for seating, materials, and contrast</li> </ul>

	<p>(h) Details of the lighting and music curation for the public lift to the level 35 public spaces</p> <p>REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.</p>
42.	<p><b>Provision of facilities</b></p> <p>Before the shell and core of the building are complete, the following details shall be submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details and so maintained for the lifetime of the building:</p> <ul style="list-style-type: none"> <li>(a) An Inclusive Toilet Strategy with details of the provision of Changing Places, wheelchair accessible and ambulant accessible toilets and baby changing facilities at a scale of no less than 1:20.</li> <li>(b) The provision of Mobility Scooter space within the building including the provision of Mobility Scooter passive EV charging with associated fire-protection measures.</li> <li>(c) Provision of quiet rooms for rest and recovery where appropriate and feasible.</li> <li>(d) Provision of room for reflection/multi faith prayer room where appropriate and feasible.</li> </ul> <p>REASON: To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments in accordance with Local Plan DM10. 8 and London Plan Policy D5.</p>
43.	<p><b>Inclusive Access Management Plan</b></p> <p>Prior to occupation of the building the following details relating to 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 details, which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for:</p> <ul style="list-style-type: none"> <li>1) Website information on building accessibility in a range of formats including photos, a 'visual story' and an easy read version with information on:</li> </ul>

	<ul style="list-style-type: none"> <li>a) Travel distances from key points of arrival and identifying rest points</li> <li>b) Location of dropped kerbs nearest to points of entry</li> <li>c) A protocol for users of the accessible parking bay for disabled users of the development. This should include, but not be limited to: <ul style="list-style-type: none"> <li>i) Dimensions of the bay and protected zones</li> <li>ii) Protocol for reserving the bay</li> <li>iii) Protocol for guided entry into the space</li> <li>iv) Protocol for requesting departure from the space</li> <li>v) Any time limits on occupancy of the space</li> </ul> </li> <li>d) Facilities available on site including dimensions and photos of (as appropriate): <ul style="list-style-type: none"> <li>i) Step-free entrance points and lift access</li> <li>ii) Accessible toilets including access to Radar keys for operation (as relevant)</li> <li>iii) Changing Places toilet provision including access to Radar keys for operation (as relevant), provision of sling for hoist (if supplied) and access to paper for changing tables</li> <li>iv) Facilities for assistance animals</li> <li>v) Equipment loan (as relevant)</li> <li>vi) Assistive listening system and other assistive technology (as relevant)</li> <li>vii) Room for rest and recovery including information on available seating and lighting levels</li> <li>viii) Room for reflection/multi faith prayer room</li> <li>ix) Charging points for vehicles and mobility scooters</li> </ul> </li> </ul> <p>2) Booking information for level 35 public spaces including arrangements for:</p> <ul style="list-style-type: none"> <li>a) Alternatives to online booking</li> <li>b) Management of queues including for people who are not able to stand for periods</li> <li>c) Inclusive security</li> <li>d) Essential companions' tickets and assistance animals</li> </ul> <p>3) Details of the Learning Space including:</p> <ul style="list-style-type: none"> <li>a) Stairs, stairwells and landing areas including sections;</li> <li>b) Details of handrails and contrast;</li> <li>c) Corridor widths and contrast;</li> <li>d) Door details at no less than 1:20 to confirm threshold details, opening mechanism and opening force in Newtons;</li> <li>e) Quiet area for rest and recovery.</li> </ul> <p>4) Details of inclusive emergency procedures including:</p> <ul style="list-style-type: none"> <li>a) Escape routes for disabled people including where there is not a separate firefighting and evacuation lift</li> </ul>
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	<p>b) Training for staff assisting the escape of disabled people, including provision of Personal Emergency Egress Plans.</p> <p>The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.</p> <p>REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.</p>
<b>Highways and Transportation</b>	
44.	<p><b>Refuse/ Recycling Storage and collection</b></p> <p>Refuse and recycling, storage and collection facilities shall:</p> <p>(a) be provided within the curtilage of the site to serve each part of the development in accordance with details, which must be submitted to and approved in writing by the Local Planning Authority prior to work commencing; and</p> <p>(b) thereafter be maintained as approved throughout the life of the building.</p> <p>REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM 17.1, DM 16.5. 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.</p>
45.	<p><b>Servicing and Delivery Hours</b></p> <p>Deliveries, servicing, including refuse recycling vehicle trips (excluding any on-foot and cargo bike deliveries) shall take place between the hours of 23:00 to 7:00, Monday to Sunday.</p> <p>REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: CS16, DM15.7, DM16.2, DM16.1, DM21.3.</p>
46.	<p><b>Restricting numbers of deliveries/servicing</b></p> <p>There shall be no more than 32 daily trips in total over any 24-hour period (accounting for a consolidation rate of 75%). Deliveries on foot and cargo bikes are not restricted.</p>

	<p>REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: CS16, DM16.1.</p>
47.	<p><b>Site Condition Survey</b></p> <p>Prior to the commencement of works, including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and detailed report of the findings must be submitted to and approved in writing by the local planning authority. Proposed threshold levels at finished floor levels (highways boundary) and levels at basement in relation to existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels unless otherwise agreed in writing by the local planning authority.</p> <p>REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.1, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>
48.	<p><b>Demolition and Construction Management Plan</b></p> <p>Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work.</p> <p>The details shall be completed in accordance with Corporation's Code of Practice for Deconstruction and Construction Sites and in accordance with TfL's latest guidelines, 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.</p> <p>No demolition or construction shall be carried out other than in accordance with the approved details and methods.</p> <p>The Demolition and Construction Management Plan to include:</p>

	<ul style="list-style-type: none"> <li>• Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with.</li> <li>• Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing.</li> <li>• Construction vehicle routes to and from the site to be approved with CoL Highways</li> <li>• Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).</li> <li>• construction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request.</li> <li>• encouraging the use of cargo bike deliveries throughout the construction process.</li> <li>• Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.</li> <li>• A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required.</li> <li>• The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: <a href="http://www.clocs.org.uk/standard-for-clocs/">http://www.clocs.org.uk/standard-for-clocs/</a>.</li> </ul> <p>REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1, and emerging City Plan 2040 policies HL2 and VT1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.</p>
49.	<p><b>Accessible Car Parking space</b></p> <p>One car parking space suitable for use by disabled people only shall be provided on the premises in accordance with the approved drawing ref: 60GCS-3XN-XX-00-DP-AR-021100 Rev A (Proposed Level 00) prior to occupation of this development, and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers</p>



	<p>and visitors without charge to the individual end users of the parking. Passive Electric Vehicle charging facilities shall be provided for the space, as well as a plan to make it active when it is safe to do so.</p> <p>REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5 and emerging City Plan 2040 policy VT3.</p>
50.	<p><b>Cycle Parking and Facilities</b></p> <p>Details of the cycle parking shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the buildings hereby permitted. The cycle parking and facilities shall be designed in accordance with the London Cycling Design Standards. Details shall include, but not limited to the following:</p> <ul style="list-style-type: none"> <li>(a) The layout of long stay and short stay cycle parking</li> <li>(b) The accessible routes to the parking areas</li> <li>(c) The accessible cycle storage spaces and cycle lifts at a drawing scale of not less than 1:20</li> </ul> <p>The provision of cycle parking spaces shall comprise of long stay cycle parking of 849 spaces and short stay cycle parking of 41 spaces. A minimum of 5% of the long and short term spaces shall accommodate larger, adapted cycles with suitable cycle lifts and other associated facilities.</p> <p>The cyclist facilities (849 lockers and 73 showers) hereby approved shall be provided adjacent to the bicycle parking areas and changing facilities prior to occupation and retained thereafter, and to be operated in accordance with the approved details throughout the life of the building.</p> <p>The cycle parking provided within the buildings must remain ancillary to the use of the buildings and available at all times throughout the life of the buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy that makes provision for disabled people and encourages greater use of cycles by commuters, and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM10.8, DM16.1, DM 16.3, DM16.4 London Plan policy TS cycling and emerging City Plan policies AT2, AT3 and HL1.</p>
51.	<p><b>Doors over the Highway</b></p>

	<p>No doors, gates or windows at ground floor level shall open over the public highway.</p> <p>REASON: In the interests of public safety and to accord with Section 153 of the Highways Act 1980.</p>
52.	<p><b>HVM</b></p> <p>The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.</p> <p>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.</p>
<b>Air Quality</b>	
53.	<p><b>Air Quality Positive Assessment</b></p> <p>A revised Air Quality Positive Assessment that includes all the proposed measures including proposed systems, and monitoring, of the measures undertaken to reduce the number of servicing vehicle trips by at least 75% and measures that incorporate dedicated stands/loading and unloading zones for cargo bikes be submitted.</p> <p>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 emerging City Plan, Policies SI1 Improving Air Quality Part B(2)(b, and d) of the London Plan.</p>
54.	<p><b>Generators</b></p> <p>There shall be no installation of diesel generators to the building hereby approved.</p> <p>REASON: In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and</p>

	<p>particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.</p>
55.	<p><b>Condition M32 NRMM</b></p> <p>Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.</p> <p>REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.</p>
56.	<p><b>Fire Safety</b></p> <p>The development shall be carried out in accordance with the approved details within the Fire Statement (dated July 2024) and Fire Statement Addendum (dated October 2024) prepared by ARUP.</p> <p>REASON: To ensure that the development incorporates the necessary fire safety measures</p>
57.	<p><b>Telecommunications equipment</b></p> <p>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 &amp; 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.</p> <p>REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.</p>
<b>Use Classes</b>	

58.	<p><b>Land Use</b></p> <p>The areas shown on the approved drawings as Offices, Café Area / Retail, the Sanctuary, the Garden, Learning Space, and associated amenity areas, and all basement and ancillary / back of house areas, shall be used for those purposes only (as specified in condition 59) and for no other purpose (including any other purpose in Class E or Sui Generis) 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).</p> <p>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 that public benefits within the development are secured for the life of the development.</p>
59.	<p><b>Floorspaces</b></p> <p>The development shall provide (all figures GIA and excluding plant):</p> <ul style="list-style-type: none"> <li>- 52,012 sq.m Office Use (Class E(g)(i));</li> <li>- 187 sq.m Retail/Café Use (Class E(a)(b));</li> <li>- 611 sq.m Elevated Public Spaces/amenity spaces (Sui Generis);</li> <li>- 83 sq.m Learning space (Sui Generis)</li> </ul> <p>REASON: To ensure the development is carried out in accordance with the approved plans.</p>
60.	<p><b>Approved Plans</b></p> <p>The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission, or the details of facades which will be approved pursuant to the Section 106 agreement:</p> <p>Proposed Basement 02 (60GCS-3XN-BS-B2-DP-AR-020097 Rev A)  Proposed Basement 01 (60GCS-3XN-BS-B1-DP-AR-020098 Rev A)  Proposed Basement Mez (60GCS-3XN-BS-BM-DP-AR-020099 Rev A)  Proposed Level 00 (60GCS-3XN-XX-00-DP-AR-021100 Rev A)  Proposed Level 01 (60GCS-3XN-XX-01-DP-AR-021101 Rev A)  Proposed Level 02 (60GCS-3XN-XX-02-DP-AR-021102 Rev A)  Proposed Level 03 (60GCS-3XN-XX-03-DP-AR-021103 Rev A)  Proposed Level 04 (60GCS-3XN-XX-04-DP-AR-021104 Rev A)  Proposed Level 05 (60GCS-3XN-XX-05-DP-AR-021105 Rev A)</p>

Proposed Level 06 (60GCS-3XN-XX-06-DP-AR-021106 Rev A)  
Proposed Level 07 (60GCS-3XN-XX-07-DP-AR-021107 Rev A)  
Proposed Level 08 (60GCS-3XN-XX-08-DP-AR-021108 Rev A)  
Proposed Level 09 (60GCS-3XN-XX-09-DP-AR-021109 Rev A)  
Proposed Level 10 (60GCS-3XN-XX-10-DP-AR-021110 Rev A)  
Proposed Level 11 (60GCS-3XN-XX-11-DP-AR-021111 Rev A)  
Proposed Level 12 (60GCS-3XN-XX-12-DP-AR-021112 Rev A)  
Proposed Level 13 (60GCS-3XN-XX-13-DP-AR-021113 Rev A)  
Proposed Level 14 (60GCS-3XN-XX-14-DP-AR-021114 Rev A)  
Proposed Level 15 (60GCS-3XN-XX-15-DP-AR-021115 Rev A)  
Proposed Level 16 (60GCS-3XN-XX-16-DP-AR-021116 Rev A)  
Proposed Level 17 (60GCS-3XN-XX-17-DP-AR-021117 Rev A)  
Proposed Level 18 (60GCS-3XN-XX-18-DP-AR-021118 Rev A)  
Proposed Level 19 (60GCS-3XN-XX-19-DP-AR-021119 Rev A)  
Proposed Level 20 (60GCS-3XN-XX-20-DP-AR-021120 Rev A)  
Proposed Level 21 (60GCS-3XN-XX-21-DP-AR-021121 Rev A)  
Proposed Level 22 (60GCS-3XN-XX-22-DP-AR-021122 Rev A)  
Proposed Level 23 (60GCS-3XN-XX-23-DP-AR-021123 Rev A)  
Proposed Level 24 (60GCS-3XN-XX-24-DP-AR-021124 Rev A)  
Proposed Level 25 (60GCS-3XN-XX-25-DP-AR-021125 Rev A)  
Proposed Level 26 (60GCS-3XN-XX-26-DP-AR-021126 Rev A)  
Proposed Level 27 (60GCS-3XN-XX-27-DP-AR-021127 Rev A)  
Proposed Level 28 (60GCS-3XN-XX-28-DP-AR-021128 Rev A)  
Proposed Level 29 (60GCS-3XN-XX-29-DP-AR-021129 Rev A)  
Proposed Level 30 (60GCS-3XN-XX-30-DP-AR-021130 Rev A)  
Proposed Level 31 (60GCS-3XN-XX-31-DP-AR-021131 Rev A)  
Proposed Level 32 (60GCS-3XN-XX-32-DP-AR-021132 Rev A)  
Proposed Level 33 (60GCS-3XN-XX-33-DP-AR-021133 Rev A)  
Proposed Level 34 (60GCS-3XN-XX-34-DP-AR-021134 Rev A)  
Proposed Level 35 (60GCS-3XN-XX-35-DP-AR-021135 Rev A)  
Proposed Plant Mez (60GCS-3XN-XX-36-DP-AR-021136 Rev A)  
Proposed Roof Top (60GCS-3XN-XX-37-DP-AR-021137 Rev A)  
Proposed Section AA (60GCS-3XN-XX-ZZ-DP-AR-022000 Rev A)  
Proposed Section BB (60GCS-3XN-XX-ZZ-DP-AR-022001 Rev A)  
Proposed Section CC (60GCS-3XN-XX-ZZ-DP-AR-022002 Rev A)  
Proposed Section DD (60GCS-3XN-XX-ZZ-DP-AR-022003 Rev A)  
Proposed Section EE (60GCS-3XN-XX-ZZ-DP-AR-022004 Rev A)  
Proposed Elevation North (60GCS-3XN-FA-ZZ-DP-AR-023000 Rev A)  
Proposed Elevation South (60GCS-3XN-FA-ZZ-DP-AR-023001 Rev A)  
Proposed Elevation East (60GCS-3XN-FA-ZZ-DP-AR-023002 Rev A)  
Proposed Elevation West (60GCS-3XN-FA-ZZ-DP-AR-023003 Rev A)  
Section 278 (Highways Plan) (23-186-T-052, Rev B)  
Basement Plan 02 (Energy Clarification Sketch 13/11/2024)

	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.
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## INFORMATIVES

### 1. Archaeology – Written Scheme of Investigation

The written scheme 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.

### 2. CAA Building Notification

If any part of the development exceeds 91.4m AGL, upon grant of permission, OPDC is required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

### 3. CAA Crane Notification

Where a crane is 100m or higher, crane operators are advised to notify the CAA ([arops@caa.co.uk](mailto:arops@caa.co.uk)) and Defence Geographic Centre ([dvof@mod.gov.uk](mailto:dvof@mod.gov.uk)). Crane notification | Civil Aviation Authority ([caa.co.uk](http://caa.co.uk)) The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

### 4. Access for Disabled People

Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

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.

5. The City Operations (City Streets & Spaces) 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. 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.

#### 7. 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.

#### 8. 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))

#### 9. Thames Water

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.

#### 10. Environmental Agency (Water Resources)

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive



corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments. We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption. We also recommend you contact your local planning authority for more information.

## 11.CIL

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](http://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.

## 12.NPPF

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.

City of London  
Environment Department  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

**For the attention of Head of Planning**

**Our ref CHBG/SHEF/173385.00003**  
**Your ref 24/00743/FULEIA**

**CMS Cameron McKenna Nabarro  
Olswang LLP**

1-3 Charter Square  
Sheffield  
S1 4HS

**DX 712550 Sheffield 20**

**T** [REDACTED]  
**F** [REDACTED]

cms.law

**E** [REDACTED]

**Email**

[REDACTED]

21 August 2024

Dear Recipient

**60 Gracechurch Street, London EC3V 0HR**

**Planning Application for demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.**

This firm, together with Huw Stephens at DLS Advisors Limited, represents Noble Title Limited, the owners of 10 Fenchurch Street which is adjacent to the Property.

We write in connection with the Planning Application.

Our client does not object to the principle of the redevelopment of the Property but is concerned to ensure that any development of the Property approved pursuant to the Planning Application does not impact the use, occupation and value of 10 Fenchurch Street either during construction or following completion and occupation of the new building.

We have reviewed the submitted Planning Application documents and it clear that as currently conceived there will be *significant* disturbance to 10 Fenchurch Street during construction.

As revealed by the Environmental Statement, the main cause of disturbance will be by reason of noise and vibration.

---

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Notice: the firm does not accept service by e-mail of court proceedings, other processes or formal notices of any kind without specific prior written agreement.

The Planning Application also shows that there will be disruptive vehicle movements and construction logistics arrangements that will significantly affect Fenchurch Street and the surrounding roads to the detriment of our client's interests.

The Planning Application also anticipates up to four cranes during construction some or all of which will need to oversail 10 Fenchurch Street at points during construction.

It is understood that such disturbance could endure for approximately **four years**.

We anticipate that some of these matters may be mitigated through the use of appropriate planning conditions and planning obligations and our client would welcome the opportunity to contribute to the terms of such conditions and obligations during the determination of the Planning Application.

Other neighbourly matters including:

- crane and scaffolding over-sailing,
- rights to light,
- party wall agreements,
- servicing arrangements (both during construction and following completion), and
- other public realm considerations

have the potential to negatively impact the use, occupation and value of 10 Fenchurch Street and need to be satisfactorily addressed through one or more legal agreements between our client and the Applicant (terms for which have yet to be negotiated).

On behalf of Noble Title Limited, we would welcome the opportunity to constructively engage with you and the Applicant to settle mutually agreeable measures to mitigate the adverse effects of the development proposals comprised in the Planning Application and to ensure that neighbourly matters are properly addressed.

Please confirm that you will take these representations into account before determining the Planning Application.

Yours faithfully

**CMS Cameron McKenna Nabarro Olswang LLP**

cc Huw Stephens, DLS Advisors

# Comments for Planning Application 24/00743/FULEIA

## Application Summary

Application Number: 24/00743/FULEIA

Address: Allianz House 60 Gracechurch Street London EC3V 0HR

Proposal: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

Case Officer: Anastasia Tampouridou

## Customer Details

Name: Mr Christopher Bowes

Address: CMS Cameron McKenna Nabarro Olswang 1 - 3 Charter Square Sheffield

## Comment Details

Commenter Type: Neighbour


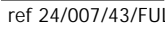
Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Noise
- Other
- Traffic or Highways

Comment: Our client Noble Title Limited (10 Fenchurch St) does not object to the principle of the redevelopment of the property but is concerned to ensure that any development of the Property approved pursuant to the Planning Application does not impact the use, occupation and value of 10 Fenchurch St during construction or following completion and occupation of the new building. We have reviewed the submitted Planning Application documents and it is clear that as currently conceived there will be significant disturbance to 10 Fenchurch St during construction. As revealed by the Environmental Statement, the main cause of disturbance will be by reason of noise and vibration. The Planning Application also shows that there will be disruptive vehicle movements and construction logistics arrangements that will significantly affect Fenchurch St and the surrounding roads to the detriment of our client's interests. The Planning Application also anticipates up to four cranes during construction some of which will need to oversail 10 Fenchurch St at points during construction. It is understood that such disturbance could endure for approximately four years. We anticipate that some of these matters may be mitigated through the use of appropriate planning conditions and planning obligations and our client would welcome the opportunity to contribute to the terms of such conditions and obligations during the determination of the Planning Application.

Other neighbourly matters including: crane and scaffolding over-sailing, rights to light, party wall agreements, servicing arrangements (both during construction and following completion), and other public realm considerations have the potential to negatively impact the use, occupation and value of 10 Fenchurch St and need to be satisfactorily addressed through one or more legal agreements between our client and the Applicant. On behalf of Noble Title Limited, we would welcome the opportunity to constructively engage with you and the Applicant.

From:   
To:   
Subject: ref 24/007/43/FULEIA - 60 Gracechurch Street EC3V 0HR  
Date: 23 October 2024 21:15:49

---

THIS IS AN EXTERNAL EMAIL

As local residents we object to a further large scale development in an area which is already too densely developed.

The construction process itself will cause even more congestion night time noise and pollution.

Kind regards

Peter Rose

Jamaica Buildings, St Michael's Alley

London EC3V 9DS

From:   
To:   
Subject: 60 Gracechurch St 24/007/43/FULEIA  
Date: 11 November 2024 15:22:37

---

THIS IS AN EXTERNAL EMAIL

Dear Sir

I am a resident in the area. I object to this development on density grounds. I doubt you will stop it for that reason, so if this goes ahead, pls attach the following conditions.

- Restrict construction so that there is NO all - night working. I suffer frequent construction noise late at night.

Regards

Jude Goffe

My full address is :

Jamaica Buildings  
St Michael's Alley  
London EC3V 9DS



From: [REDACTED]  
To: [REDACTED]  
Subject: RE: Planning Application Consultation: 24/00743/FULEIA (our ref pgo-5594)  
Date: 23 July 2024 13:44:18  
Attachments: [image001.png](#)

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Further information is available on the HSE website [here](#).

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-5594) in all future correspondence.

Kind regards

*Lisa Gaskill*

**Operational Support for Planning Gateway One**  
Health and Safety Executive | Building Safety Division



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

From: [REDACTED]  
Sent: Tuesday, July 23, 2024 11:57 AM  
To: PlanningGatewayOne  
Subject: Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation for Allianz House 60 Gracechurch Street London EC3V 0HR .  
Reply with your comments to [REDACTED]

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou  
Environment Department  
City of London

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From: [REDACTED]  
To: [REDACTED]  
Subject: RE: Tree Works Consultation: 24/00743/FULEIA  
Date: 23 July 2024 15:48:08

---

No concerns.

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

From: [REDACTED]  
Sent: Tuesday, July 23, 2024 12:05 PM  
To: Joshi, Shravan (Deputy)  
Subject: Tree Works Consultation: 24/00743/FULEIA

Dear Chairman

Please see attached consultation for works to trees in a conservation area at Allianz House 60 Gracechurch Street London EC3V 0HR Reply with any comments to [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk).

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou  
Environment Department  
City of London



[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

26 July 2024  
Crossrail Ref: CRL-IP-3230

**Transport for London**  
Crossrail Safeguarding  
5 Endeavour Square  
LONDON  
E20 1JN

Dear Anastasia Tampouridou,

**24/00743/FULEIA: Allianz House 60 Gracechurch Street London EC3V 0HR**

*Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).*

Transport for London administers the Crossrail 2 Safeguarding Direction made by the Secretary of State for Transport on 24 March 2015.

Thank you for your letter dated 23 July 2024, requesting the views of CRL\_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no further comment on the application.

If you require any further information, please contact:  
[CRL\\_Safeguarding@tfl.gov.uk](mailto:CRL_Safeguarding@tfl.gov.uk)

Yours sincerely,

**Will Orlik**  
Safeguarding Officer (Elizabeth line)  
[CRL\\_Safeguarding@tfl.gov.uk](mailto: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](mailto: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: [NATS Safeguarding](#)  
To: [PLN - Comments](#)  
Cc: [NATS Safeguarding](#)  
Subject: RE: Planning Application Consultation: 24/00743/FULEIA [SG37619]  
Date: 26 July 2024 11:08:54  
Attachments: [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image007.png](#)  
[image008.png](#)

THIS IS AN EXTERNAL EMAIL

Dear Sirs, NATS has assessed the application and has identified an unacceptable impact upon its H10 radar located at Heathrow Airport.

Accordingly, should the LPA be minded to grant the scheme, NATS respectfully requests the imposition of the following planning conditions on any planning permission.

Regards  
S. Rossi  
NATS Safeguarding Office

### **Aviation Conditions**

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

**REASON:**

In the interests of aircraft safety and the operations of NATS En-route PLC.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

**REASON:**

In the interests of aircraft safety and the operations of NATS En-route PLC.

3. No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator".

Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

**REASON:**

In the interests of aircraft safety and the operations of NATS En-route PLC.

For the purpose of conditions 1-3 above;

"Operator" means NATS (En Route) plc, incorporated under the Companies Act (4129273) whose registered office is 4000 Parkway, Whiteley, Fareham, Hants PO15 7FL or such other organisation licensed from time to time under sections 5 and 6 of the Transport Act 2000 to provide air traffic services to the relevant managed area (within the meaning of section 40 of that Act).

"Radar Mitigation Scheme" or "Scheme" means a detailed scheme agreed with the Operator which sets out the measures to be taken to avoid at all times the impact of the development on the H10 Primary and Secondary Surveillance radar and air traffic management operations of the Operator.

"Crane Operation Plan (COP)" means a detailed plan agreed with the Operator which defines the type of crane and the timing and duration of all crane works to be carried out at the site in order to manage and mitigate at all times the impact of the development on the H10 Primary and Secondary Surveillance Radar systems at Heathrow Airport and associated air traffic management operations of the Operator.



**Sacha Rossi**

ATC Systems Safeguarding Engineer

D: [REDACTED]

E: [REDACTED]

4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL  
[www.nats.co.uk](http://www.nats.co.uk)



---

From: [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk) <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>

Sent: Tuesday, July 23, 2024 11:53 AM

To: NATS Safeguarding <[NATSSafeguarding@nats.co.uk](mailto:NATSSafeguarding@nats.co.uk)>

Subject: [EXTERNAL] Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation for Allianz House 60 Gracechurch Street London EC3V 0HR .  
Reply with your comments to [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk).

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou  
Environment Department  
City of London

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If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

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Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

---

**From:** [Location Enquiries](#)  
**To:** [PLN - Comments](#)  
**Subject:** RE: Planning Application Consultation: 24/00743/FULEIA  
**Date:** 26 July 2024 11:39:47  
**Attachments:** [image001.png](#)  
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good morning,

**Application No:** 24/00743/FULEIA

**Site address:** Allianz House 60 Gracechurch Street London EC3V 0HR

**Proposal:** Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

*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 | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



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

From: [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk) <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>  
Sent: Tuesday, July 23, 2024 11:53 AM



To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>  
Subject: Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for Allianz House 60 Gracechurch Street London EC3V 0HR .

Reply with your comments to [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk).

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou  
Environment Department  
City of London

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This message has been scanned for malware by Forcepoint. [www.forcepoint.com](http://www.forcepoint.com)

Date: 26 July 2024  
Our ref: 483338  
Your ref: 24/00743/FULEIA



[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)  
**BY EMAIL ONLY**

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam,

**Planning consultation:** Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

**Location:** Allianz House 60 Gracechurch Street London EC3V 0HR

Thank you for your consultation on the above dated 23 July 2024 which was received by Natural England on 23 July 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### **SUMMARY OF NATURAL ENGLAND'S ADVICE**

##### **NO OBJECTION**

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

#### **Sites of Special Scientific Interest Impact Risk Zones**

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the [data.gov.uk](https://data.gov.uk) website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any

queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully,

Beemal Brahmhatt  
Consultations Team

Anastasia Tampouridou  
Corporation Of London  
Development Plan  
PO Box 270  
London  
EC2P 2EJ

**Our ref:** NE/2024/137255/01  
**Your ref:** 24/00743/FULEIA  
**Date:** 29 July 2024

Dear Anastasia,

**Allianz House, 60 Gracechurch Street, London, EC3V 0HR**

**Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.**

Thank you for consulting us on the above application. Based on the information available, the application raises no environmental concerns for us. We therefore have **no comments** on this application, however, please consider the following advice.

### **Water Resources**

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

### **Pre Application Advice**

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at [HNL Sustainable Places@environment-agency.gov.uk](mailto:HNL Sustainable Places@environment-agency.gov.uk).

Cont/d..

**Final comments**

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

If you have any questions, please email me at [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk), quoting the reference at the beginning of this letter.

Yours sincerely,

**Harry Scott**  
**Planning Advisor**

E-mail: [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk)

Telephone: 02030251774



**Memo**

**To** Assistant Director (Development Management)  
Environment Department

**From** Lead Local Flood Authority  
Environment Department

**Date** 1 August 2024

**Our Ref** DS/SUDS24/0043

**Your Ref** PT\_AXT/24/00743/FULEIA

**Subject** Allianz House 60 Gracechurch Street London EC3V 0HR

**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 and Drainage Strategy – July 2024 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 underground 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 l/s from the building, provision should be made for an attenuation volume capacity capable of achieving this which shall be no less than 150m<sup>3</sup>;
- (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.**



Historic England

Anastasia Tampouridou  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ

Your Ref: 24/00743/FULEIA  
Our Ref: 222477

Contact: Helen Hawkins



01 August 2024

Dear Anastasia,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2023**

**Allianz House 60 Gracechurch Street London EC3V 0HR**

*Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.*

**Recommend Archaeology Condition**

Thank you for your consultation received on 23 July 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.

**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



Historic England, 4<sup>th</sup> 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.





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.

An archaeological desk-based assessment (MOLA 2024) has been submitted with the planning application. The DBA highlights that although archaeological remains of Roman and medieval date have previously been found on the site in 1959 and 1995, the current basements are likely to have removed all but the deepest cut features. The proposed development entails extending Basement 2 into a previously undisturbed area in the south-east of the site. However, this area has already been truncated by the construction of Basement 1. As there is some potential for deep cut archaeological remains to survive in this area, a watching brief during ground reduction is recommended.

### 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

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

I therefore recommend attaching a condition as follows:

Condition      No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and  
A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

[HistoricEngland.org.uk](http://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.



- 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 WSI

**Informative** The written scheme 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.

This pre-commencement condition is 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 this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition 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:

### **Watching Brief**

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

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**  
Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South East Region



Historic England, 4<sup>th</sup> 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: 24/04990/OBS

**Please reply to:** Nikki Mitchell  
Tel No: [REDACTED]  
Email: [REDACTED]

**Town Planning & Building Control**  
Westminster City Council  
PO Box 732  
Redhill, RH1 9FL

5 August 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.:** 24/04990/OBS

**Application Date:**

**Date Received:** 23.07.2024

**Date Amended:** 23.07.2024

**Plan Nos:** Letter from City of London dated 23rd July 2024 ref. 24/00743/FULEIA

**Address:** Allianz House, 60 Gracechurch Street, City Of London, London

**Proposal:** Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the 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.



Anastasia Tampouridou  
City of London  
By email

Heathrow Airport Limited  
Airside Operations Facility  
Heathrow Airport  
Hounslow, Middlesex TW6 2GW  
Tel: +44(0) 208 757 0887  
Email: Safeguarding@Heathrow.com

07/08/24

Dear Anastasia,

**Re: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement.**

**Location: Allianz House 60 Gracechurch Street London EC3V 0HR.**

**Planning Reference: 24/00743/FULEIA**

**Our Ref: LHR5966**

We refer to your letter dated 23 July 2024, received in this office on the same day.

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below:

**H10 Radar Mitigation Condition**

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

**REASON:** In the interests of aircraft safety and the operations of Heathrow airport.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

**REASON:** In the interests of aircraft safety and the operations of Heathrow airport.

3. No construction work shall commence on site until the Developer has agreed a “Crane Operation Plan” which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the “Radar Operator”. Construction at the site shall only thereafter be operated in accordance with the approved “Crane Operation Plan”.

**REASON:** In the interests of aircraft safety and the operations of Heathrow airport.

**We will need to object to this proposal unless the above-mentioned condition is applied to any planning permission.**

We would also like to bring the following to your attention:

**CAA Building Notification**

If any part of the development exceeds 91.4m AGL, upon grant of permission, OPDC is required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

**CAA Crane Notification**

Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Yours sincerely

Simon Vince  
For and on behalf of Heathrow Airport Limited

From: Eleftheriou-Vaus, Kyri  
 Sent: Wednesday, August 7, 2024 3:15 PM  
 To: Tampouridou, Anastasia [REDACTED]  
 Cc: Bentley, Paul [REDACTED]  
 Subject: Allianz House 60 Gracechurch Street\_24/00743/FULEIA

Hi Anastasia

Before finalising my comments for this application, I would be grateful if you could please ask the transport consultant and the air quality consultants for some feedback on the traffic aspects of the assessments. An impact assessment of the operational traffic has not been undertaken; the Environmental Statement Chapter 6 states the changes in traffic flow do not meet the screening threshold levels of 25 Heavy Duty Vehicles (HDVs) or 100 Light Duty Vehicles (LDVs) per day. However, the net change in traffic flows are not provided in the air quality assessment or the Transport Assessment, in addition the data for taxis are only provided for the AM and PM peak hours in the transport assessment. I would be grateful if this data could be provided in full.

I also have some queries regarding the traffic flows used in the air quality assessment presented in Annex 4 Roads Modelling Methodology. Whilst the impact of the operational traffic of the development has been scoped out based on the thresholds (as above), future levels have been modelled at 3 locations on the development site. Table A4.2 (screenshot below) presents the AADT data used in the assessment. I note some very significant changes in traffic flows between 2022 and 2029 but it is not clear why the differences are as great as they are; I include a comparison of some of the data as examples below. The data used for 2022 is based on modelled data and presumably not affected by covid restrictions, however that is not clear; clarification of this is required. The 2029 AADT data is also modelled but in some instances the traffic flows have almost tripled compared to 2029.

	AADT 2022	AADT 2029	Change
King William st	9466	9985	519
Cannon st	9329	9841	512
Gracechurch St south of junc.	8872	12001	3129
Gracechurch St north of junc.	7600	9395	1795
Bishopsgate	3204	8592	5388
Aldgate High St	2678	7814	5136

Road Link	AADT	% Car	% LGV	% HGV	% HGV	% HGV	% Cycle
2 Bishopsgate	8,895	36.5	51.8	12.8	4.7	1.3	1.3
2 Bishopsgate	5,088	30.7	45.4	15.5	1.3	1.3	1.3
2 Old Broad Street	5,825	17.5	42.7	15.0	0.7	1.4	1.4
2 Aldgate High Street	7,814	47.3	10.1	30.4	0.8	0.5	10.4

Kind Regards

Kyri

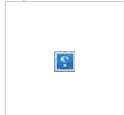


Kyri Eleftheriou-Vaus  
 Air Quality Officer | Port Health & Public Protection  
 [REDACTED]  
 City of London | Guildhall | London | PO Box 270 | EC2V 7HH  
[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

Bob Roberts  
 Interim Executive Director Environment

Please note I work part time Monday AM, Tuesday, and Wednesday.

<https://www.air-aware.co.uk/> Helping raise awareness of local air quality



Follow us on Twitter @CityAir

Download the CityAir App for current information on air pollution in the City





**From:**  
**To:**  
**Subject:** Our DTS Ref: 77471 Your Ref: 24/00743/FULEIA  
**Date:** 09 August 2024 14:13:53

THIS IS AN EXTERNAL EMAIL

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 77471 Your Ref: 24/00743/FULEIA  
9 August 2024

Dear Sir/Madam

**Re: ALLIANZ HOUSE 60, GRACECHURCH STREET, LONDON, -, EC3V 0HR**

#### 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](mailto: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](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk](http://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.

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 1825-2:2004 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 : [www.thameswater.co.uk/help](http://www.thameswater.co.uk/help)

With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, 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:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://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](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, 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:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://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](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

#### Water Comments

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](mailto: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 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>

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

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](http://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](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

#### Supplementary Comments

The supplied drainage strategy references Foul & Surface Water discharge to a combined sewer in Gracechurch Street. However, Thames Water have been unable to identify an accessible discharge point that serves the site. The only point of discharge from the site is a 305mm combined connection in St Benet's Place (TQ32809802B) which does not have the capacity to serve this development. Please confirm points of discharge (by manhole) for both Foul & Surface Water.

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](mailto:devcon.team@thameswater.co.uk)

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LPA Ref: 24/00743/FULEIA

London City Airport Ref: 2024/LCY/161

Date: 09/08/2024

Dear Anastasia Tampouridou,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority are of a mind to approve this application, then London City Airport suggests the condition contained in this letter is added to any future approval.

<b>LPA Reference</b>	24/00743/FULEIA
<b>Proposal</b>	Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.
<b>Location</b>	Allianz House 60 Gracechurch Street London EC3V 0HR
<b>Borough</b>	City of London
<b>Case Officer</b>	Anastasia Tampouridou

London City Airport's response must change to an objection unless these conditions are applied to this planning permission.

### **Radar Mitigation Condition**

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

**REASON:** In the interests of aircraft safety and the operations of London City Airport.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

**REASON:** In the interests of aircraft safety and the operations of London City Airport.

3. No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator".

Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

**REASON:** In the interests of aircraft safety and the operations of London City Airport.

### **Permanent Obstacle Lighting Scheme**

Obstacle lights shall be placed on all corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

**Reason:** Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make you aware of the following:

### **CAA Building Notification**

As the proposed development exceeds 91.4m AGL, upon grant of permission, Hammersmith & Fulham Council are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

### **CAA Crane Notification:**

Where a building or crane is 100m or higher, developers and crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk).

The following details should be provided before the crane is erected:

- the crane's precise location

- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are 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 London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of London City Airport or not to attach conditions which London City Airport has advised, it shall notify London City Airport and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Kind regards,

**Lucy Dale**

On behalf of London City Airport



Ms Anastasia Tampouridou  
City of London Corporation  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01580188

12 August 2024

Dear Ms Tampouridou

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

**ALLIANZ HOUSE 60 GRACECHURCH STREET LONDON EC3V 0HR  
Application No. 24/00743/FULEIA**

Thank you for your letter of 23 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**

Historic England is particularly concerned about the harm to the significance to St Mary Woolnoth that would be caused by the proposed development, as seen in views as one approaches it from the west. Such harm could be avoided or minimised by a reduction in height which would bring the proposals in line with the height of neighbouring consented schemes, and by simplifying the façade design. We therefore strongly encourage you to explore such amendments.

The potential harmful impact of the proposals on other highly designated heritage assets, including the Monument and the Tower of London World Heritage Site also need to be carefully considered, particularly in a scenario when other consented developments are not built. Any conclusions on the impact on the OUV of the World Heritage Site need to be substantiated by a Heritage Impact Assessment using the appropriate methodology, which may indicate further opportunities to avoid or minimise harm.

**Historic England Advice**

Significance of the heritage assets

a) The Church of St Mary Woolnoth & Bank Conservation Area

St. Mary Woolnoth was completed in 1727 in the English Baroque style and represents



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one of the most distinctive and original designs of its architect Nicholas Hawksmoor. It has an unusually imposing façade, which is dominated by two distinctive flat-topped turrets supported by Corinthian columns, a great illustration of Hawksmoor's skill in manipulating mass, Classical detail and sculptural forms to achieve a dramatic effect.

The church is grade I listed indicating its exceptional historic and architectural interest. It was designed to have a dominant and imposing presence - an appreciation of its architectural effect is reliant on its setting, including the relative scale of surrounding buildings and clear sky backdrop.

It is located within the Bank Conservation Area, covering the heart of the historic financial district, to which it makes a major positive contribution. The area is centred on Bank junction and encompasses the major thoroughfares of Poultry and Cornhill. The character of the area is defined by high-quality nineteenth century and early twentieth century commercial buildings, many of which are listed. 1 Cornhill (grade II) is one such example - its dome 'makes the principal accent of the principal crossing of the City', as described in *The Buildings of England*.

The City Cluster already appears prominently in views looking east from the junction and dominates the scale of the listed buildings in the foreground. Many of these were designed to have landmark qualities; the impact of the visually dominant cluster is distracting and therefore cause some harm to the ability to appreciate their significance. However, existing views to the south east are less affected and may therefore be more vulnerable to adverse change. 20 Fenchurch Street is the only existing tall development which appears in the backdrop; 55 Gracechurch Street would additionally appear if constructed, albeit at a lower height.

#### b) The Monument

The Act for the Rebuilding of the City of London, passed in 1667, stipulated a monument to the Great Fire, that was to be stone column or pillar. Sir Christopher Wren and his Chief Assistant, Dr Robert Hooke, collaborated on the design - a colossal Doric column on a tall pedestal with a cupola and ornament sitting on the capital above. It was erected 1671-7 and is one of the City's most significant landmarks.

Public monuments pre-dating the Georgian period are particularly rare and reflect the arrival of Renaissance modes of commemoration to Britain. At the time of its construction it was the tallest isolated stone column in the world, and as such is an important feat of both engineering and architectural accomplishment. The structure is grade I listed and a scheduled monument.

It was designed to have a dominant and imposing presence - an appreciation of its architectural effect is reliant on its setting, including the relative scale of surrounding



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buildings and clear sky backdrop. Its dominance and wide-ranging visibility have been diminished by modern development, leaving the remaining good quality views of it particularly vulnerable to further detrimental change. One such view is from outside the Church of Saint Magnus the Martyr, looking north up Fish Street Hill. This street was once on the alignment of Old London Bridge and would have been a well-known view of the Monument at the point where one entered the City on the historically important processional route from the south.

#### c) The Tower of London World Heritage Site

The Tower's attributes, as defined in the adopted WHS Management Plan (2016) convey its Outstanding Universal Value (OUV). They reflect the Tower's role as the setting of many significant episodes of European history and as a model example of the development of a medieval fortress palace. It is an iconic landmark and symbol of London which sits at the heart of our national and cultural identity. The Tower of London is a monument of exceptional historic and architectural importance as reflected in its multi-designation as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area.

The Tower's landmark siting and visual dominance are key aspects of its significance and adverse impacts on these will affect the integrity of the World Heritage Site. These elements of significance, as experienced through views into, within and out of the property are increasingly vulnerable due to tall buildings in the City and additional development has the potential to compound this harm.

#### d) Tower Bridge

With its distinctive form and silhouette, the Sir Horace Jones's nearby Tower Bridge from the late 19<sup>th</sup> century is both an engineering marvel and an internationally recognised symbol of London. On its approach from the east its structure creates the sense of a portal framing entry into central London.

#### Impact of the proposals

The proposals are for the replacement of the existing building on the site with a new tall building designed by 3XN Architects. It would be of a similar scale to adjacent developments - slightly shorter than 20 Fenchurch Street and slightly taller than consented developments either side at 55 Gracechurch Street and 70 Gracechurch Street.

These developments have, or would once constructed, contribute to harm to multiple highly graded heritage assets (particularly those referred to above) by increasing the visual dominance and distraction of the Cluster in their settings. The current proposals would be largely occluded or framed by these existing and consented developments



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when seen in conjunction with them, but at the height proposed would introduce some new visual impacts. Those that are of most concern to us are set out below.

The consented development at 55 Gracechurch Street (20/00671/FULEIA) is a material consideration - but if it is not built out, the current proposals would have similar harmful impacts as those previously identified in our letter of objection to that application.

#### a) St Mary Woolnoth and the Bank Conservation Area

The church's significance through the contribution of its setting, as appreciated in views from Bank junction, would be harmed, as would the character and appearance of the Bank Conservation Area. The proposed development would appear taller than 20 Fenchurch Street, and would be closer to the viewpoints around the junction, increasing its dominance and distracting effect on the listed buildings in the foreground. The detailed design of the proposals, with visually striking ladder of the terraces all the way up the building on its eastern elevation, would compound this impact. Existing Cluster buildings are typically plainer in character with unmodulated glass-curtain walls that are less of a visual distraction.

The best locations to appreciate St Mary Woolnoth are slightly closer, from the northern end of King William Street. The proposals would introduce a new harmful impact to the skyline in reducing the clear sky backdrop to the church's distinctive tower. This would detract from the ability to appreciate its architectural qualities and as a landmark building. The applicants own Heritage and Townscape Visual Impact Assessment has found harm to the listed building due the impact illustrated in View 6.

#### b) The Monument

In a cumulative scenario, the proposals would largely be occluded by 55 Gracechurch Street, which appears slightly taller due to being closer to the viewpoint in front of St Magnus the Martyr.

If 55 Fenchurch remains unbuilt, the proposals would appear directly behind the column of the Monument up to the height of the capital and viewing gallery. This effect would diminish in a kinetic experience moving north along Fish Hill Street, but one would still be left with an impression of the Monument being dwarfed by its context, which runs counter to its intended purpose. The applicants own assessment also concludes that harm to the significance of the listed building and scheduled monument would be caused.

#### c) The Tower of London World Heritage Site

In a cumulative scenario, the proposals would largely be hidden by 20 Fenchurch



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Street and 55 Gracechurch Street (if constructed) in views of and from the World Heritage Site. It would slightly add to the bulk and density of the Cluster and could result in an adverse impact on attributes forming the OUV of the World Heritage Site. Those attributes include its Physical Dominance, its appreciation as an Internationally Famous Monument and its Landmark Siting.

If the latter development is not built, the current proposals would increase the visual dominance of the Cluster in a similar way to the approved scheme for 55 Gracechurch Street, albeit more of the development would be behind 20 Fenchurch Street in most views.

#### d) Tower Bridge

When viewing Tower Bridge from Butler's Wharf looking upstream towards 20 Fenchurch and 55 Gracechurch Street would be prominently visible in the backdrop of Tower Bridge, framed by the bridge's iconic form. If the latter development is not built, the current proposals would add considerable additional built form to this framed view and further reduce the amount of clear sky within the space between the two towers and upper and lower decks of the bridge that allows the unique form of the bridge to be appreciated and understood. The proposals would therefore add some harm to the considerable harm already caused by the presence of No. 20 Fenchurch Street to the significance of Tower Bridge through development within its setting, albeit less than 55 Gracechurch Street would.

#### Relevant policy and guidance

##### a) The City of London Plan 2015 - 2026

Policy CS12: Historic Environment, seeks the "safeguarding [of] the City's listed buildings and their settings" and "Preserving and, where appropriate, seeking to enhance the Outstanding Universal Value...of the Tower of London World Heritage Site and its local setting."

Policy CS13: Protected Views, aims "to protect and enhance significant City and London views of important buildings, townscape and skylines...by...securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, so ensuring its OUV."

Policy CS14: Tall Buildings, states that such development will only be permitted on sites that 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. The policy indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas.



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## b) The London Plan 2021

London Plan Policy HC1 Heritage conservation and growth requires development proposals affecting heritage assets and their settings to conserve their significance. It further requires the cumulative impacts of incremental change to be actively managed.

London Plan Policy HC2 World Heritage Sites, requires development proposals in the setting of WHSs to conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes. It additionally requires development within the setting of a WHS to be supported by a Heritage Impact Assessment.

London Plan Policy D3 requires all development to follow a design-led approach that optimises the capacity of sites, including consideration of design options to determine the most appropriate form of development that responds to a site's context.

London Plan Policy D9 Tall Buildings requires that proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification. Where the proposals concern the setting of a World Heritage Site, the policy reserves the strongest protection, stating that new tall buildings "must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it".

## c) The National Planning Policy Framework (NPPF)

The NPPF requires planning policies and decisions to reflect relevant international obligations and statutory requirements (Paragraph 2). This includes those obligations under the 1972 World Heritage Convention which require that the UK Government protects and conserves the World Heritage within its territory.

Chapter 16 of the NPPF concerns the historic environment. Paragraph 195 notes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. It recognises that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

A robust and proportionate understanding of the significance of any affected heritage assets is required and this should be taken into account in order to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a



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development proposal (Paragraphs 200-201).

If harm is deemed to be less than substantial, paragraph 208 of the NPPF requires that harm be weighed against the public benefits of the proposals. Great weight should be given to the conservation of designated heritage assets, irrespective of the level of harm caused, and the more important the asset, the greater the weight should be (Paragraph 205). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (Paragraph 206).

Chapter 12 of the NPPF considers good design as a key aspect of sustainable development. Paragraph 135 requires that developments should be sympathetic to local character and history, and Paragraph 193 states that development that is not well designed should be refused permission, especially where it fails to reflect local and government design guidance. Related to this, the National Design Guide (NDG, 2021) emphasises the importance of heritage and context when considering the merits of a design.

#### d) The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (GPA3)

GPA3 recommends a staged approach to understanding impacts on setting. Step 3 of this guidance requires an assessment of the effects of proposed development on significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided, including:

- § Proximity to asset
- § Position in relation to key views to, from and across
- § Prominence, dominance or conspicuousness
- § Competition with or distraction from the asset
- § Dimensions, scale and massing
- § Materials (texture, colour, reflectiveness, etc)
- § Change to skyline, silhouette
- § Lighting effects and 'light spill'

#### Historic England's position

The proposals would cause harm to highly valued features of the historic City. In each case the harm would be less than substantial in the language of the NPPF, and relatively low in the range. However, this harm would occur to heritage assets of the highest significance and therefore attracts the greatest possible weight. We are therefore unable to support the proposals in their current form.

The City's adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City's historic environment and its skyline, including the OUV of the Tower. Similarly, the London Plan provides for a robust protection of significance,



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including OUV in policies HC1 and HC2. All of these policies indicate the need to carefully manage the cumulative impacts of incremental change.

We are concerned about the new harmful impacts that would be caused to the significance of the Grade I listed Church of St Mary Woolnoth, as appreciated in some of the best views of it from the west. Such harm could be avoided or minimised by a reduction in height which would bring the proposals in line with the height of neighbouring consented schemes, and by simplifying the façade design. We therefore strongly encourage you to explore such amendments.

Any conclusions on the impact on the OUV of the World Heritage Site need to be substantiated by a heritage impact assessment using the appropriate methodology, which may indicate further opportunities to avoid or minimise harm. The application submission does not adequately assess the impact on attributes of OUV and this must be undertaken in order to comply with the requirements of Para 200 of the NPPF and Policy HC2 of the London Plan.

The Operational Guidelines for the Implementation of the World Heritage Convention (2023) advise that a Heritage Impact Assessment (HIA) is essential for all interventions, including development projects, that are planned within or around a World Heritage property (paragraphs 110, 118bis). Specific guidance on the HIA process has been produced: UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022). This explains how a HIA can be used iteratively throughout the design process as a tool to identify how a proposal might affect a property's attributes, its integrity and authenticity, and how any negative effects might be avoided.

UNESCO's World Heritage Centre has recently requested that the UK Government submit a report about the WHS' State of Conservation by 01 December 2024. This request was prompted by concerns about the cumulative impact of tall building development within the Tower of London's setting.

In the context of this heightened international scrutiny we would urge you to request a proportionate heritage impact assessment, guided by UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022). This will address the UK's obligations under the World Heritage Convention as implemented in line with the Operational Guidelines (paragraphs 110 and 118bis), and will assist in confirming the extent of any potential impacts in relation to attributes of the World Heritage Site's OUV to inform determination of this application.

## Recommendation

Historic England has concerns regarding the application on heritage grounds. We would welcome the opportunity to discuss ways of avoiding or minimising the harm we



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have identified above. A modest reduction in height would potentially resolve some of our key concerns because it would likely remove or reduce new harmful impacts.

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention, as soon as a proportionate Heritage Impact Assessment is available. Historic England would recommend that any decision on this application be deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

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.

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

**Alexander Bowring**

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.*



From: [REDACTED]  
To: [REDACTED]  
Subject: RE: Planning Application Consultation: 24/00743/FULEIA  
Date: 13 August 2024 14:41:52

---

Good Afternoon,

Having reviewed the relevant documents, I am satisfied with the developments proposals to accommodate all utility services.

Happy to approve. Kind regards, Sye

Sye Thevathas  
Strategic Infrastructure & Highways Asset Manager  
City of London | Environment Department | City Operations Division  
Guildhall | London | EC2V 7HH  
[REDACTED]

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

From: [REDACTED]  
Sent: Friday, August 2, 2024 9:43 AM  
To: Thevathas, Sye [REDACTED]  
Subject: Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation for Allianz House 60 Gracechurch Street London EC3V 0HR .  
Reply with your comments to HYPERLINK "<mailto:PLNComments@cityoflondon.gov.uk>"  
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou  
Environment Department  
City of London

Anastasia Tampouridou  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Development Management  
Planning and Building Control  
Housing and Regeneration Directorate  
Tower Hamlets Town Hall  
160 Whitechapel Road  
London E1 1BJ  
[www.towerhamlets.gov.uk](http://www.towerhamlets.gov.uk)

**Application Number:** PA/24/01290  
**Your ref:** 24/00743/FULEIA

**Enquiries to:** Eleanor Downton  
**Tel:** 0207 364 5009  
**Email:** [REDACTED]

14 August, 2024

Dear Anastasia Tampouridou,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

**OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY**

**Location  
Proposal**

Allianz House 60 Gracechurch Street London EC3V 0HR  
Observation requested by City Of London for demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application. I would be grateful if you would take the observations set out about into consideration:-

1. **CITY OF LONDON REFS: 24/00743/FULEIA**

**TOWER HAMLETS REF: PA/24/01290**

**ADDRESS: Allianz House 60 Gracechurch Street London EC3V 0HR**



The best of London in one borough

**Tower Hamlets Council**  
Tower Hamlets Town Hall  
160 Whitechapel Road  
London  
E1 1BJ



**PROPOSAL:** Observation requested by City Of London for demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.

**Comments:**

These proposals are for a new office-led tall building development on the intersection of Gracechurch Street and Fenchurch Street. The site is within the Easter (City) Cluster and within London's Central Activities Zone (CAZ).

The Councils' main considerations in respect of this application is the impact on the setting of the Tower Of London, World Heritage Site. The development will also likely be viewed from other locations within Tower Hamlets including The Tower Conservation Area.

The assessment should have regard to relevant LBTH guidance such as the following: Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020), Urban Structure and Characterisation Study (2009) and its Addendum (2016) and other relevant guidance, such as Conservation Area appraisals, design guides, supplementary planning documents and the Tower Hamlets Conservation Strategy.

In the submitted supporting document for the application, ES Volume II: Townscape Heritage and Visual Impact Assessment July 2024, the impact of the proposed building on different views of and from Tower Bridge and Tower of London, is demonstrated. In views 9, a wireline is used to demonstrate the proposed development in the backdrop of the bridge.

Development within the existing tall building cluster of the City of London is clearly visible within the setting of the World Heritage Site as seen in views 11 and 12. The impact on the Tower must be given special attention commensurate to its important designation. The Tower should not be dominated by new development close to it.

City of London Corporation should consider whether these should also be provided as rendered views, as the Proposed Development is clearly visible alongside the massing of existing developments in the area. This is of even further importance as views 10 and 11 would experience a significant effect during operational development.

Additionally, it is unfortunate that the Applicant has not taken into account and

provided the visibility from LBTH Borough Designated View 2 from Wapping Wall bridge to St Paul's Church (as shown in Figure 6 of Tower Hamlets Local Plan 2031), as requested in the LBTH consultation response to the Scoping Opinion Request.

In summary, the proposed building would exacerbate the existing harm caused to the setting of the Tower of London, and numerous other heritage assets within its context, by the tall buildings which form the city cluster. The proposal would expand the width of the cluster and therefore its perceived mass in the setting of the Scheduled Ancient Monument. We therefore object to the proposal due to the harm cause to the setting of the Tower of London.

**ES Statement:**

LBTH were previously consulted upon and provided a response to the EIA Scoping Opinion Request for the subject application site in June 2024. LBTH consultation responses to the Scoping Opinion Request have been referenced below where relevant.

With reference to Schedule 4(2) of the EIA Regulations, the ES includes an assessment of alternatives and design evolution in Chapter 3. Whilst LBTH expected to see more explicit reference to the consideration of alternative scale and massing when it comes to effects on the Tower of London World Heritage Site and Scheduled Monument, and Tower Bridge Grade I listed building and their settings, it has been noted that consideration to these receptors has been given through LVMF views as noted in paragraph 3.15 of Chapter 3.

The Environmental Statement (ES) concluded that the following aspects and matters that could affect LBTH will result in insignificant residual effects: Air Quality, Noise and Vibration, Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, Wind Microclimate, Climate Change, Heritage, Townscape and Visual Impact Assessment.

In the consultation response to the Scoping Opinion Request, LBTH listed cumulative schemes within their jurisdiction which should be taken into account in the assessments. It is unfortunate to see that none of those have been considered.

A Heritage, Townscape and Visual Impact Assessment (HTVIA) has been provided within Volume 2 of the ES. The HTVIA follows an unusual format given that the effects during demolition and construction are provided in Chapter 7, before even understanding the baseline and scoping process of the relevant receptors.

The assessment concludes a minor adverse effect during demolition and construction and minor neutral effect during operational development on the Tower

of London WHS, listed buildings within and the Tower Conservation Area. LBTH considers that the Applicant should have provided an assessment on each receptor so the residual effects can be clearly understood for distinct receptors and designations, however, the non-significant effects both during demolition and construction and operational development are agreed.

The HTVIA considers the impact on the following heritage receptors within LBTH: Tower of London World Heritage Site (WHS) and listed buildings within it, the Tower Conservation Area and Grade I Tower Bridge and its surrounds. The Tower of London's designation as Scheduled Monument is only mentioned, however, it appears that no assessment of that particular designation has been carried out. Similarly, it is not clear whether all listed buildings within the Tower of London as stated in paragraph 8.253 of the HTVIA have been considered in the assessment.

Views 10 and 11 would experience a significant effect during operational development leading to moderate to major beneficial. With regard to the visual impact assessment, the relevant receptors within LBTH include Views 12a, 12b and 12c, all which are located within the Tower of London. LBTH welcomes the use of winter photography for these views so that full impact from the Proposed Development can be understood.

Assessed views 12a, 12b and 12c would all experience non-significant effects, concluded as negligible to minor adverse effect during the demolition and construction phase. This would be the same for the cumulative assessment of demolition and construction for Views 12a and 12b while View 12c would experience no effect.

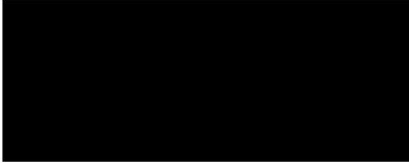
All of the three views would experience negligible to minor neutral effect (non-significant) as a result of the operational development. This would be the same in the cumulative assessment for Views 12a and 12b, while for View 12c there would be no effect in the cumulative assessment.

It should be noted that the assessments within the Built Heritage and Townscape and Visual Assessments are subjective. City of London Corporation should consider whether adequate justification has been provided for the conclusions of the ES in relation to townscape, visual and heritage effects.

In terms of the ES, LBTH has no objections in relation to the aspects listed, on the basis that the ES is considered to be adequate by City of London Corporation in accordance with the EIA Regulations 2017 (as amended), and the methodology adopted is appropriate and does not under or overstate the assessment of effects. City of London Corporation must consider whether further information is required in accordance with Regulation 25 of the EIA Regulation.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



**Sripriya Sudhakar, Director Planning and Building Control**



## HISTORIC ROYAL PALACES

City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Attn: Ms A Tampouridou  
By email to: [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

19 August 2024

Ref: 60 Gracechurch Street, London, EC3V 0HR  
Application No. 24/OO743/FULEIA

Dear Ms Tampouridou

Thank you for your letter of 23 July notifying us of this planning application and inviting us to submit observations within 30 days.

The Tower of London is a monument of exceptional historic and architectural importance as reflected in its designations as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area. Its Landmark Siting and the Physical Dominance of the White Tower are two of the key attributes of its Outstanding Universal Value (OUV), experienced through views into, within and out of the property, that are vulnerable to the impact of tall buildings in the City.

This development is located within the City of London's proposed southern extension of the City Cluster, appearing on the west side of the Cluster when viewed from the Tower of London. It remains our view that the continual encroachment of the City Cluster on the key views to and from the Tower have caused incremental harm to the OUV of the World Heritage Site. The extension of the Cluster to incorporate 20 Fenchurch St will exacerbate that harm.

The proposed development at 60 Gracechurch Street will be largely occluded from key views to and from the Tower by 20 Fenchurch Street and the consented scheme for 55 Gracechurch Street (if built out) and so in the cumulative view the additional harm would be less than substantial.

If the latter scheme is not constructed however, the proposals for 60 Gracechurch Street would add significantly to the bulk of the cluster on the western edge and hence on the OUV attributes described above. We do not agree that the effect would be in any way 'beneficial' as described in the applicant's Heritage and Townscape Visual Impact Assessment (HTVIA) and the harm must be weighed against the public benefits of the proposals.

Historic Royal Palaces

Tel +44(0)20 3166 6000 [www.hrp.org.uk](http://www.hrp.org.uk)

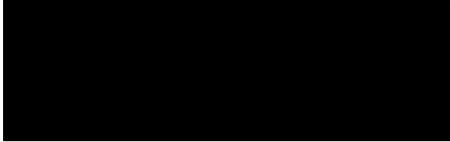
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The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU



**HISTORIC ROYAL PALACES**

Yours sincerely



**Adrian Phillips**  
Palaces & Collections Director



**Historic Royal Palaces**

Tel +44(0)20 3166 6000 [www.hrp.org.uk](http://www.hrp.org.uk)

Historic Royal Palaces is a Registered Charity (No. 1068852) and Historic Royal Palaces Enterprises Ltd, a company registered in England (No. 3418583)

The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU



---

From: Tastsoglou, Anna <[redacted]>  
Sent: Thursday, August 22, 2024 2:09 PM  
To: Eleftheriou-Vaus, Kyri <[redacted]>; Tampouridou, Anastasia <[redacted]>  
Cc: Bentley, Paul <[redacted]>  
Subject: RE: Allianz House 60 Gracechurch Street\_24/00743/FULEIA

Hi Kyri,

I can confirm that Delivery and Servicing Plans are secured and monitored by planning obligations.

To secure that no diesel generators are not installed, we can impose a compliance condition that would restrict their installation. If in the future they would wish to install one, they would need to remove the condition and this can only be done via the submission a S73 application.

I trust the above is of some assistance.

Kind regards,

Anna

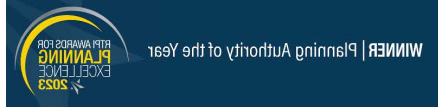


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**Anna Tastsoglou | Principal Planning Officer (Development Management)**  
Environment Department | City of London | Guildhall | London EC2V 7HH

[redacted] [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

Katie Stewart – Executive Director, Environment



---

From: Eleftheriou-Vaus, Kyri <[redacted]>  
Sent: Wednesday, August 21, 2024 5:30 PM  
To: Tampouridou, Anastasia <[redacted]>; Tastsoglou, Anna <[redacted]>  
Cc: Bentley, Paul <[redacted]>  
Subject: RE: Allianz House 60 Gracechurch Street\_24/00743/FULEIA

Hi Anna/ Anastasia

Thank you for forwarding the information to me. It appears that the traffic data used in the air quality assessment is based on the assumption from the transport statement (EIA) and Outline Delivery and Servicing Plan that the expected 119 servicing vehicles per day expected for the proposed development will be, as a result of off-site freight consolidation, reduced by at least 75%, to approximately 30 vehicles per day. It is therefore essential that this level of reduction can be achieved. I would therefore be grateful if you could confirm what controls can be applied to ensure that systems are in place within the final Delivery and Servicing Plan to achieve this. The outline plan does not provide detailed proposals on how this will be achieved or how it will be monitored. This is key as the combined increase in taxis, servicing and delivery vehicles without this reduction would otherwise have triggered a dispersion impact assessment.

Lastly the Utility Statement (July 24) proposes that two new incoming power supplies from two independent UKPN primary substations will be provided which will allow the removal of standby diesel generators within the building, both for life safety and mains failure. How do we ensure that future occupiers do not install diesel generators, as without the necessary assessments and conditions it is unlikely that any future installations will be able to meet the necessary requirements to minimise emissions and reduce the impact on neighbours and within the building itself?

I would be grateful on your views on whether the most appropriate way to deal with these concerns would be within the section106 agreement.

Kind Regards

Kyri

---

From: Tastsoglou, Anna <[redacted]>  
Sent: Tuesday, August 20, 2024 3:54 PM

To: Eleftheriou-Vaus, Kyri <[REDACTED]>  
Cc: Tampouridou, Anastasia <[REDACTED]>  
Subject: FW: Allianz House 60 Gracechurch Street\_24/00743/FULEIA

Hi Kyri,

I forward you the applicant's responses to your comments in Anastasia's absence.

Kind regards,

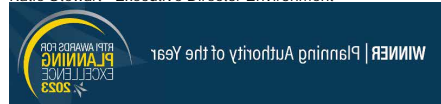
Anna



**Anna Tastsoglou | Principal Planning Officer (Development Management)**  
Environment Department | City of London | Guildhall | London EC2V 7HH

[REDACTED] | [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

Katie Stewart –Executive Director Environment



---

From: Michael Green <[REDACTED]>  
Sent: Monday, August 19, 2024 5:05 PM  
To: Figueira, Pearl <[REDACTED]>; Tampouridou, Anastasia <[REDACTED]>  
Cc: Tastsoglou, Anna <[REDACTED]>; Peter.Twemlow <[REDACTED]>  
Subject: RE: Allianz House 60 Gracechurch Street\_24/00743/FULEIA

THIS IS AN EXTERNAL EMAIL

Hi Anastasia,

Appreciate Pearl has now left the City.

Please could you circulate our response onto your Air Quality colleagues?

Updated appendices now attached.

Thanks,

Michael

Michael Green  
Senior Planner



DP9 Ltd  
100 Pall Mall  
London  
SW1Y 5NQ  
telephone: 020 7004 1700 website: [www.dp9.co.uk](http://www.dp9.co.uk)

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From: Michael Green  
Sent: Monday, August 19, 2024 5:03 PM  
To: Figueira, Pearl <[REDACTED]>; Tampouridou, Anastasia <[REDACTED]>  
Cc: Tastsoglou, Anna <[REDACTED]>; Peter Twemlow <[REDACTED]>  
Subject: RE: Allianz House 60 Gracechurch Street\_24/00743/FULEIA

Hi Pearl,

Please see below our responses to your Air Quality team's comments.

**CoL Air Quality Team comments**

Before finalising my comments for this application, I would be grateful if you could please ask the transport consultant and the air quality consultants for some feedback on the traffic aspects of the assessments. An impact assessment of the operational traffic has not been undertaken (**Response 1**); the Environmental Statement Chapter 6 states the changes in traffic flow do not meet the screening threshold levels of 25 Heavy Duty Vehicles (HDVs) or 100 Light Duty Vehicles



(LDVs) per day. However, the net change in traffic flows are not provided (Response 1) in the air quality assessment of or the Transport Assessment, in addition the data for taxis are only provided for the AM and PM peak hours in the transport assessment. I would be grateful if this data could be provided in full. (Response 1)

I also have some queries regarding the traffic flows used in the air quality assessment presented in Annex 4 Roads Modelling Methodology. Whilst the impact of the operational traffic of the development has been scoped out based on the thresholds (as above), future levels have been modelled at 3 locations on the development site. Table A4.2 (screenshot below) presents the AADT data used in the assessment. I note some very significant changes in traffic flows between 2022 and 2029 but it is not clear why the differences are as great as they are: I include a comparison of some of the data as examples below. The data used for 2022 is based on modelled data and presumably not affected by covid restrictions, however that is not clear; clarification of this is required. The 2029 AADT data is also modelled but in some instances the traffic flows have almost tripled compared to 2029 (Response 2).

#### Applicants Response

Response 1:

Please refer to para 6.67 in ES Chapter 6, which sets out the operational traffic movements:

“In addition, the Proposed Development will generate four HDVs and 32 LDVs on Gracechurch Street, Fenchurch Street and Eastcheap, both of which are well below the screening thresholds and are lower than the movements associated with the existing Site. It is, therefore, not considered necessary to assess the impacts of traffic emissions during the operational phase and it can be concluded that the Proposed Development will not have a significant impact on local roadside air quality as a result of road traffic emissions.”

With respect to taxis, the proposals will generate 40 taxis (20 arrivals/departures) across the day which equates to a net uplift of 30 daily taxis from existing. It is assumed that taxi trips are already on the network and associated with pass-by trips.

Response 2:

AQC (Air Quality Consultant for this project) has been through the calculations and reporting in detail following this comment. The tables in the Annex to the ES Chapter have a couple of typographical errors, i.e. some of the data may accidentally have corresponded to a different road, hence the significant differences between the 2022 and 2029 values. These have been updated to provide the correct values and the Annex is attached, and table provided below. This does not alter the assessment or results of the ES Chapter, as the values were correctly used in the modelling, they were just misrepresented in the annex table.

For the Air Quality Assessment and for the modelling undertaken as part of this, the extend of the model domain was beyond the information initially provided by Velocity as the Transport Consultants. As such, and to maintain consistency across the modelling scenarios (e.g., for verification and opening year), traffic data from the London Atmospheric Emissions Inventory (LAEI) were used explicitly.

	AADT 2022	AADT 2029	Change
King William St	9466	9985	519
Cannon St	9329	9841	512
Gracechurch St south of junc.	8872	9395	523
Gracechurch St north of junc.	7600	8017	417
Bishopsgate	8145	8592	447
Aldgate High St	7408	7814	407

Please could you circulate this response onto your Air Quality team?

Please let me know if any further queries are received prior to their issue of the formal comments.

Kind regards,

Michael

Michael Green  
Senior Planner



DP9 Ltd  
100 Pall Mall  
London  
SW1Y 5NQ  
telephone: 020 7004 1700 website: [www.dp9.co.uk](http://www.dp9.co.uk)

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From: Michael Green

Sent: Wednesday, August 14, 2024 2:10 PM

To: Figueira, Pearl [REDACTED]; Peter Twemlow [REDACTED]

Cc: Tampouridou, Anastasia [REDACTED]; Tastsoglou, Anna [REDACTED]

Subject: RE: Allianz House 60 Gracechurch Street\_24/00743/FULEIA

Hi Pearl,

I hope you're well.

Apologies for the delay coming back to you, I returned from leave yesterday and catching up on emails.

We are discussing the Air Quality Teams comments below with Velocity and Trium and will come back with our responses asap (likely to be early

next week, but we will endeavour to reply sooner).

Thanks,  
 Michael Green  
 Senior Planner



DP9 Ltd  
 100 Pall Mall  
 London  
 SW1Y 5NQ  
 telephone: 020 7004 1700 website: [www.dp9.co.uk](http://www.dp9.co.uk)

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From: Figueira, Pearl <[redacted]>  
 Sent: Thursday, August 8, 2024 9:33 AM  
 To: Peter Twemlow <[redacted]>; Michael Green <[redacted]>  
 Cc: Tampouridou, Anastasia <[redacted]>; Tastsoglou, Anna <[redacted]>  
 Subject: FW: Allianz House 60 Gracechurch Street\_24/00743/FULEIA

Hi Peter

Hope all well.

Could you please send the below queries from air quality team to the consultants for air quality and transport?

many thanks

*Before finalising my comments for this application, I would be grateful if you could please ask the transport consultant and the air quality consultants for some feedback on the traffic aspects of the assessments. An impact assessment of the operational traffic has not been undertaken; the Environmental Statement Chapter 6 states the changes in traffic flow do not meet the screening threshold levels of 25 Heavy Duty Vehicles (HDVs) or 100 Light Duty Vehicles (LDVs) per day. However, the net change in traffic flows are not provided in the air quality assessment of or the Transport Assessment, in addition the data for taxis are only provided for the AM and PM peak hours in the transport assessment. I would be grateful if this data could be provided in full.*

*I also have some queries regarding the traffic flows used in the air quality assessment presented in Annex 4 Roads Modelling Methodology. Whilst the impact of the operational traffic of the development has been scoped out based on the thresholds (as above), future levels have been modelled at 3 locations on the development site. Table A4.2 (screenshot below) presents the AADT data used in the assessment. I note some very significant changes in traffic flows between 2022 and 2029 but it is not clear why the differences are as great as they are; I include a comparison of some of the data as examples below. The data used for 2022 is based on modelled data and presumably not affected by covid restrictions, however that is not clear; clarification of this is required. The 2029 AADT data is also modelled but in some instances the traffic flows have almost tripled compared to 2029.*

	AADT 2022	AADT 2029	Change
King William st	9466	9985	519
Cannon st	9329	9841	512
Gracechurch St south of junc.	8872	12001	3129
Gracechurch St north of junc.	7600	9395	1795
Bishopsgate	3204	8592	5388
Aldgate High St	2678	7814	5136

Road Link	TDA	% Cat	% LDV	% HGV	% HGV	% HGV	% HGV	% HGV	% HGV	% HGV
Enfurchr Street	7.036	40.4	18.3	18.8	5.7	12.0	10.0			
London Street	3.843	44.5	22.1	21.8	2.0	0.0	10.3			
Comhill	5.005	28.1	18.8	18.8	4.1	8.8	17.1			
London Street	3.380	38.1	18.7	18.3	4.1	7.7	10.3			
Bishopsgate	8.003	38.3	21.8	18.8	4.7	13.1	8.4			
London Street	5.888	20.7	23.4	15.3	1.8	11.8	11.8			
Old Broad Street	5.825	17.3	22.7	15.0	0.7	14.4	10.1			
Aldgate High Street	7.814	47.3	10.1	20.4	8.8	8.3	10.4			

Pearl Figueira  
 Planning Officer  
 Environment Department  
 Tel: 07749 714 818



EC2P 2EJ

[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

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## 60 Gracechurch Street, City of London- TfL comments

### Summary

- £200,000 is sought for a new Cycle Hire docking station at the site or in the local vicinity.
- More detailed Construction plans and further engagement with TfL are required due to potential impacts on pedestrians, cyclists and buses along A10 Gracechurch Street.
- This must include a Stage 1 Road Safety Audit (RSA) and Pedestrian Comfort Levels (PCLs) analysis for the proposed construction access arrangements, provided prior to determination.
- A Section 106 (S106) contribution of £729,869 (BCIS index linked) is sought for the A10 Transport for London Road Network (TLRN) improvement scheme including junction, crossing and footway improvements and making permanent the footway extensions delivered in temporary materials during the COVID pandemic. This also requires a backstop clause to ensure delivery of TLRN highway works around the site boundary in the event that our scheme should not proceed as planned, though it is currently expected to do so in good time for completion and opening of the development, as required by CIL and S106 regulations.
- ATZ (Active Travel Zone) and local highway improvements, particularly at the Fenchurch Street pedestrian crossing, should be secured by the Corporation and funded by the development.
- The proposed cycle parking entrance on Fenchurch Street should also be subject to a Stage 1 RSA and Designer's Response prior to determination. RSAs requested must comply with TfL Road Safety Audit Procedure May 2014 SQA 0170.
- The trip generation and London Underground (LU) impact assessment in the TA requires further work, especially given that full strategic modelling would usually be expected given the size and scale of the proposed development.
- PCL analysis of adjacent local crossings is also requested.
- Currently the cycle parking proposed does not comply with London Plan policy T5 and the London Cycle Design Standards (LCDS) in terms of design and amounts of different parking types.

### Existing site and local transport context

The site is 16,158 sqm (GIA) made up of offices with some retail on the ground floor. Current vehicle access is located on the A10 Gracechurch Street. This serves both delivery and servicing including waste, and car park of 9 spaces, 10 motorcycle parking spaces and 40 cycle parking spaces. Pedestrian access is on Gracechurch Street for the office aspect and the retail entrances are on the northwest corner on the Gracechurch and Fenchurch Street junction.

The nearest current Cycle Hire docking stations are located at St Mary Axe, Aldgate approximately 460m northeast; Great Tower Street, Monument approximately 250m south and Bank of England Museum approximately 400m northwest.

In addition, Monument junction south of the site, just north of London Bridge, has been identified by TfL and the City Corporation as a priority location for highway safety improvements.

However, a TfL Safer Junction scheme to improve safety at Monument, Camomile Street and Fenchurch Street is currently unfunded.

In line with expected increases in pedestrian crowding and general transport and travel demand at these locations, safety issues are likely to become more acute and should be addressed.

A10 Gracechurch Street is now subject to a permanent order restricting traffic to buses and cycles only from Monday to Friday from 7am to 7pm between the junctions with Commercial Road in Shoreditch and at Monument close to London Bridge. It also features several footway extensions and other highway improvements currently built from temporary materials.

We are working to deliver improvement works along the A10 and make elements of the temporary COVID pandemic scheme there permanent, for example through improvements to the highway layout and surface materials. Costs will depend on the exact works undertaken, which are not yet clarified. Such potential permanent works are also currently partially unfunded. Implementation from 2025 onwards is likely.

The application should be supported by a nighttime Active Travel Zone (ATZ) assessment.

It has so far included five key routes which we are satisfied adhere to our ATZ guidance, but only day time assessment has been provided. We have the following comments on the submitted assessment:

*Route One (to Liverpool Street station)*

The worst section of this route was identified where the crossing is at Bell Inn Yard. The reason being for poor footway condition, with lack of tactile paving, irregular dropped kerb, providing accessibility issues for some footway users. Given this is on Gracechurch Street, the footway works will mitigate this issue on this route and therefore TfL have no significant concerns.

*Route Two (to Aldgate station)*

The worst section of this route was identified as a narrow section of footway on the northern side of Fenchurch Street, east of Lime Street, which the ATZ details are a difficult section of footway to navigate for mobility impaired users. There is also a signalized crossing which may result in queuing, deepening the issue.

Any footway widening will need to be agreed with the City of London as the highway authority, via S278.

*Route Three and Four (to Canon Street and London Bridge stations)*

The worst section of this route was identified as an informal pedestrian island on Cannon Street for Route Three and Route Four was on the same junction on the

section of King William Street consisting of a long pedestrian refuge island resulting in a longer crossing time.

As we recently commented, on the draft Local Plan, Monument junction needs major improvements to ensure cyclist safety.

Its list of highway improvements due to be delivered by 2030 includes the route north-south, London Bridge to Liverpool Street via Bishopsgate with Monument junction, marked as to be delivered as 'in partnership with TfL'.

#### *Route Five (to Bank station)*

The worst section of this route is the western end of Lombard Street which has concerns regarding cyclist experience. Towards Bank Station is a segregated contraflow cycle lane, but in the location, car and delivery vehicles infringe upon the lanes resulting in an uncomfortable experience for cyclists. Given cycling will be a main mode of accessing the site, TfL recommends the applicant enters discussions with the City of London, as the highway authority to address these issues.

The main pedestrian entrance is proposed to remain at the northwest corner of the site where Fenchurch Street meets Gracechurch Street, similar to the existing retail entrance, with secondary entrances proposed into a new public realm area to the south along A10 Gracechurch Street.

The cycle access is proposed to be located on Fenchurch Street to the north, with entry via a dropped kerb. The delivery and servicing access is proposed to remain in via Gracechurch Street; but accessing into a shared space with upgraded public realm, described as the 'undercroft' in the submitted application materials.

Deliveries and servicing are therefore proposed to take place only at night. This would align with the traffic restrictions on the A10 and is therefore supported.

The design of the undercroft space should comply with London Plan policy D8 part H and reflect the Public London Charter. Public access is proposed from 7am-11pm only, as 24/7 public access would conflict with night-time loading.

Short stay cycle parking is proposed within the Undercroft space. This must be accompanied by signage explaining it will be unusable and inaccessible from 11pm to 7am each night. Furthermore, this time-limited access does not meet LCDS as required by London Plan policy T5 and therefore the short stay cycle parking proposed is significantly below required standards.

We acknowledge the application has clarified St Benet's Place is outside of the site boundary and is privately owned. It is also not within or close to TfL highway. However, if possible, the applicant and the City should investigate potential for it to be made permeable northwards through to the Gherkin in future.

#### **Cycle parking**

##### *Access*

The access for all cycle parking will be located on Fenchurch Street to the north.

We are disappointed to see that our concerns regarding the level of safety and accessibility of the Fenchurch Street access have not been addressed in the submitted TA. These were expressed through the TfL Pre-Application service.

We request further consideration of a fresh design for the cycling access. The proposed cycling access in off Fenchurch Street will be designed to accommodate cyclist access and pedestrian flows as a safe and welcoming environment for both. This could include road markings, dropped kerbs, tactile paving, and the advice given on LCDS chapter 4.5.5, taking account of forecast cycle and pedestrian flows.

The access proposed would lead to three dedicated cycle parking lifts, which the TA confirms would be LCDS compliant in terms of dimensions (1.2m x 2.3m). The doors to the long stay cycle parking areas must also be self opening and closing with a minimum opening of 1000mm. We acknowledge no dedicated stairs with gully are proposed to be provided.

The applicant must also confirm if the access proposed on Fenchurch Street will be accessible 24 hours a day or will be locked during the night.

The applicant should clarify a contradiction in the TA at section 3.6.16, where it states all cycle parking and end of journey facilities are to be located in the basement off Fenchurch Street. However, below on paragraph 3.6.18, it discusses short stay cycle parking and cycle lockers to in the Undercroft area.

Given that the Undercroft is to be dual use, public realm during the day and a delivery and servicing area at night, we are concerned that short stay bikes could be left overnight, conflicting with visits by delivery and servicing vehicles.

We require further information on how the development is going to manage and mitigate this conflict.

The Delivery and Servicing Plan (DSP) details that cargo bikes will be able to use the entrance off Fenchurch Street for daytime deliveries only, given the bike store is inaccessible between 11pm-7am. This is supported by TfL.

#### *Amount*

Given the investment in cycle networks leading to the City of London, and the high demand for cycle parking, the applicant should aim to achieve the London Plan standard. TfL recognises that work has been done to comply with London Plan standards, and the applicant has suggested use of British Council for Offices February 2023 Key Design Criteria which sets out approximate occupancy levels for modern buildings. This calculates Net Internal Area space per person (NIA), rather than Gross External Area (GEA), as per London Plan policy. However, London Plan cycle parking standards are based on GEA which will continue to be the basis for TfL comments.

Under London Plan requirements the site should provide 849 long stay and 41 short stay cycle parking spaces with at least 5% for larger / adapted cycles. The site should provide a mixture of two tier and Sheffield stands.

The applicant is proposing 608 long stay spaces to be located in the basement and 12 short stay cycle parking spaces are proposed within the Undercroft, 27 below London Plan requirements.

The remaining short stay spaces are instead proposed as 27 active travel lockers, accessed via Fenchurch Street. There is need to robustly justify why such a shortfall in short stay and no end of journey facilities located in the Undercroft area.

In pre-application advice we requested for the applicant to explore options for additional cycle parking on upper floors, which we believe could potentially be accommodated on the 1<sup>st</sup> floor.

### *Design*

Crowding at peak times around access points into the cycle parking considering pedestrian levels of comfort and congestion may prevent the cycle parking arrangements proposed being well-located, convenient and accessible for all as required by the LCDS and London Plan policy T5.

The long stay cycle parking is proposed as 61% two tier stands, 5% Sheffield stands, 5% larger Sheffield stands and 29% 'active travel lockers'. This represents too high a proportion of lockers which are not LCDS compliant and do not count towards a policy compliant cycle parking provision overall.

Further design and layout information is requested by TfL to ensure better London Plan compliance in relation to cycle parking, which the current proposals do not achieve.

### **Cycle Hire**

We request £200,000 funding and if possible land within the site for a new Cycle Hire docking station. Should land be unavailable within the site a specific off-site location on local City highway should be identified and specified in the planning decision and appropriate planning obligations secured.

Cycle Hire usually caters for shorter ad hoc journeys, often as part of multi-stage public transport trips, as distinct from general cycling as a transport mode.

Notwithstanding, in this determination, Cycle Hire may be acceptable in lieu of full compliance with London Plan cycle parking under policy T5. The applicant should have considered this when presenting their case for cycle parking as requested during TfL pre-application discussions.

Demand for TfL Cycle Hire is extremely high locally and the vicinity is not currently served by a docking station within close walking distance. The nearest ranks in the top 4% and the second closest is in the top 15% busiest in London.

Furthermore, the development itself will contribute to increased demand which requires mitigation. Without additional Cycle Hire capacity, additional drivers and vans will be required to visit the area to redistribute bikes between existing oversubscribed docking stations, to prevent them regularly becoming completely full or empty.



Following a site visit with the City of London, TfL has identified Rood Lane as a potentially suitable site for new TfL Cycle Hire infrastructure. The docking station would be located approximately 130m east of the site directly serving and benefiting users of the proposed development. This should be investigated and clarified further prior to determination, to inform appropriate planning obligations and a contribution as requested.

### **Deliveries and Servicing**

The proposed development is expected to generate 30 delivery and servicing trips a day mostly from 11pm-7am. The offsite freight consolidation proposed is strongly supported by TfL in line with London Plan Policy T7 (Deliveries, servicing and construction).

The Undercroft would include two night only loading bays at grade. At the entrance of the proposed delivery and servicing area a Copenhagen crossing is proposed extending the footway treatment across the inward access.

This is supported by TfL as it would prioritise pedestrians and improve the streetscape legibility where the highest number of pedestrian movements occur on A10 Gracechurch Street. The Copenhagen crossing style treatment and other works to establish access and relate our highway to the new internal Undercroft public realm will need to be delivered via Section 278 (S278) works agreement with TfL with full sign-off by TfL and at no cost to us. This must be secured in the S106 agreement.

We suggested during pre-application discussions that the applicant explored options of the cargo bike deliveries being on street, potentially on Fenchurch Street to avoid conflict with pedestrians on the busier Gracechurch Street. The applicant is now proposing this which is welcome, so daytime deliveries by bike would use the main cycle entrance and away from the Undercroft public realm.

Swept paths have been provided showing a 7.5t box van and refuse collection vehicle should be able to enter and egress the site safely in forward gear.

We note the outline DSP says A small number of food and beverage deliveries to the retail unit and offices will be 'direct to site', rather than consolidated. Between 7am-7pm on weekdays arrivals from the A10 will need to be by cargo bike due to traffic restrictions. As some clarity is lacking and there may be some risk of failure to comply with the DSP as proposed, we would support simply capping the total number of deliveries per day by condition and restricting all access by motor vehicles to match our local Traffic Order.

The Delivery and Servicing Plan (DSP) should be secured by pre-occupation condition to support London Plan policy T7.

Nighttime servicing only with no vehicle trips to and from the site except between 11pm and 7am should also be secured by a separate pre-occupation condition.

### **Trip generation and modelling**

Improvements are required to the trip generation analysis. The current data tables should be checked against the borough level mode share data available in our public strategic modelling dashboard to re-estimate expected mode shares. The application currently uses outdated mode splits from the 2011 Census.

Impact assessment should be provided for the lunchtime peak, which is likely to be significant due to the nature of the development. LU station distribution splits should be re-checked using 2023 NUMBAT data should it be published by TfL prior to determination.

The expected mode shares used for cycling in the Transport Assessment (TA) are 14% for the AM and 12% for the PM peak. The City should note the London Plan cycle parking requirements are sufficient to serve a future cycling mode share of at least 19%.

The expected trip generation for deliveries and servicing is 30 per day as the site is aiming for 75% consolidation, noting these trips will take place at night between 11pm-7am, which is supported.

The TA estimates the development proposal would generate approximately 1,609 and 1,360 additional total LU trips at local stations during peak hours. A

The applicant has failed to carry out any strategic modelling which would usually be expected given the size and scale of the development. Active travel mitigation should therefore be secured instead. City Corporation decision reports for similar recent planning consents have acknowledged and secured, where necessary, local works to widen pavements and improve pedestrian crossings through S278 and S106 obligations with financial contributions to TfL.

Although the proposals are not supported by modelling, we are of the view that contributions to TfL of £200,000 for Cycle Hire and £729,869 (BCIS index linked) for highway mitigation are reasonable and necessary.

In pre-application discussions we also requested detailed static capacity analysis should be undertaken for Bank and Liverpool Street stations following the LU Methodology which was attached to the TfL pre application meeting report. This analysis should demonstrate any capacity issues at the stations and forecast station interchange patterns.

The application does not include any such analysis, or full strategic modelling, both of which would usually be expected given the size and scale of the development. Active travel mitigation should therefore be secured instead. City Corporation decision reports for similar recent planning consents have acknowledged and secured, where necessary, local works to widen pavements and improve pedestrian crossings through S278 and S106 obligations with financial contributions to TfL.

Although the proposals are not supported by modelling, we are of the view that contributions to TfL of £200,000 for Cycle Hire and £729,869 (BCIS index linked) for highway mitigation are reasonable and necessary.

### **Pedestrian Comfort Levels (PCLs) and Vision Zero analysis**

The proposals are supported by a PCL assessment which is welcome. The growth factor assumed for future baseline pedestrian movement are acceptable in principle.

However the more recent TfL MoTION dashboard shows total public transport trips to and from the City of London are currently expected to increase by approximately 2% in our 2031 planning forecast and 15% in our 2041 planning forecast.

Those uplifts should also be tested prior to determination as a worst-case scenario assumption for future crowding in the PCL assessment.

The PCL assessment submitted has covered the footways and crossings immediately outside the development, as these are often recognised as local footway capacity pinch points.

The applicant has conducted a PCL footway assessment with future baseline with development and TfL COVID footway widening. The results show location 1, which is southwest of the site adjacent to the proposed Undercroft location, score as C+, location 2 on the western side of the site as C+, location 3 northwest of the site as B-, location 4 north of the site as B and location 5 which is where the new cycle parking entrance on Fenchurch Street is located is B.

A further assessment of PCLs including all crossing waiting areas on footways adjacent to all arms of the adjacent Fenchurch Street/Gracechurch Street/Lombard Street junction has been conducted. This was assessed during the morning peak of 8:15-9:15am, the Gracechurch Street north and south crossings made up 71% of the movement distribution.

The PCL identified that the Fenchurch crossing would be worsened with the proposed development lowering it from a C to C-. As a result, the applicant is proposing to increase the crossing width by 400mm and relocate the existing island to the west, which we support. This should be secured with applicant funding. The PCL identified that the Fenchurch crossing would be worsened with the proposed development lowering it from a C to C-. As a result, the applicant is proposing to increase the crossing width by 400mm and relocate the existing island to the west. Along Fenchurch Street adjacent to the main proposed cycling access, the applicant should consider highway design changes in terms of the future road markings and kerb alignment to ensure that vehicles as well as pedestrians are aware of turning manoeuvres. We are concerned about crowding and potential future conflict between people and vehicles at this access point.

The proposed results for the crossings PCL with development for the Fenchurch Street as detailed above would be C-, or C if the applicant widens the crossing width, Gracechurch Street south arm would be B-, north arm would be B and Lombard Street would be B. However cyclist access needs to be further explored prior to agreeing a widened crossing.

Finally, we also request PCL assessment of the pit lane and for any footway gantry arrangements proposed temporarily for during construction. We feel this is essential to ensure Vision Zero and full compliance with London Plan policies T2 and T7. Overall, the current crossings at all arms of the junction are PCL E, with D being on the Gracechurch Street north arm. The current footways with the temporary COVID materials are B-,C,C+,C and C-. These scores reflect on the low level of pedestrian comfort

### **Highway improvements contribution requested**

Our request £729,869 (BCIS index linked) to the A10 improvement scheme is proportionate to that recently secured to the development permitted at 55 Bishopsgate and matches the approach being applied to all similar emerging planning proposals nearby.

As we advised at pre-application stage, TfL would prefer to carry out the A10 highway works. We recently advised the City Corporation in comments on their draft local plan 'City Plan 2040' that we currently expect to deliver walking improvements along the A10 by 2030.

Should the requested contribution be agreed, no Section 278 (S278) highway works to the TLRN outside the site boundary on A10 Gracechurch Street would be necessary. Although, a 'backstop' clause in the S106 will need to ensure delivery by the applicant of the same highway improvements previously agreed, if our scheme is not implemented by completion and occupation of the development.

Furthermore, a S278 agreement with TfL will be required for construction access and remediation should construction vehicles access the site from the TLRN side. The highway improvement works are currently built in temporary materials, due to budget constraints, and for ease of implementation during the COVID pandemic.

Further works are needed to make the temporary materials permanent and improved condition. The highway works and planning obligations secured to support this development must therefore be updated to ensure they are robust and deliverable, with sufficient flexibility different future scenarios.

Overall, mitigations on impacts or the direct provision of public transport, walking and cycling facilities, along with highway improvements / financial contributions will be required to address adverse transport impacts that are identified.

Therefore, as stated above applicant should provide a financial contribution for TfL to deliver significant improvements under an agreed scope, in line with the Mayor's Vision Zero and Healthy Streets strategies.

Further information regarding the construction access and time scales is required to aid TfL understanding on what is required on Gracechurch Street, and to help TfL co-ordinate your emerging works with the A10 scheme, whilst addressing any highway safety and pedestrian and cycling priority issues appropriately.

All highway works proposed, secured and eventually delivered will follow the design guidance in the TfL Streets toolkit and the new TfL Cycle route quality criteria. The

applicant should also consider the recommendations of Stage 1 safety audits in the final design of proposals for construction access and on local highway.

### **Car parking**

The development would be car free except for one Blue Badge space within the Undercroft public realm space, as required by London Plan Policy T6.E.

The Blue Badge space must meet national accessibility standards and this should be demonstrated prior to determination. Further information is also required on how access to it could be practically managed if it were made available to a permanent regular full-time worker on request.

A survey of 3 nearby on-street blue badge parking spaces should also be carried out and shared with City and TfL transport officers, to enable assessment of their current capacity and the step free accessibility of existing walking routes from them to the site.

### **Construction logistics**

An Outline Construction Logistics Plan (CLP) has been produced, but a detailed version in accordance with TfL best practice guidance must be secured by condition and approved in consultation with TfL.

The CLP must be in place before construction commences in line with London Plan policy T7 (Deliveries, Servicing and Construction). Due to the sensitive location, we request the applicant engages with TfL to mitigate potential conflicts on the A10.

We understand the applicant hopes to commence construction early 2026 and complete by mid 2029, so a 41 month programme of construction works is expected.

Construction vehicles are proposed to access the site via Fenchurch Street and exit via Eastcheap. Two pitlanes are proposed on both the A10 and Fenchurch Street frontages, which seems excessive.

Any proposed pitlane and gantry on Gracechurch Street would require a S278 agreement and highway licenses from TfL, and our prior approval. It currently appears major footway improvements as part of our A10 improvement scheme are likely to be under construction at the same time as the development.

We request swept paths for all types of bus and construction vehicle likely to pass or use the proposed construction access, as well as 2 buses passing with the potential pitlane proposed in place.

PCL assessments are also required for any proposed gantry temporarily narrowing footway space, in line with TfL Healthy Streets and Vision Zero principles. Footways must be accessible for all members of the public, including wheelchair users, prioritising safety in terms of visibility and lighting and surveillance.

Further discussions with TfL are strongly advised due to the limited information given at this stage. We note ongoing discussions with the neighbouring office

development, 70 Gracechurch, and encourage collaboration with them to share highway space and limit strategic highway and vulnerable road user impacts.

We also request a Stage 1 RSA for the construction access arrangements currently proposed, to support further discussions.

All construction vehicles accessing the site should be Construction Logistics and Community Safety standard (CLOCS) and Fleet Operator Recognition Scheme (FORS) Silver or Gold accreditation and be at least Direct Vision Standard 3. This is vital to mitigate any safety issues.



Anastasia Tampouridou  
Environment Department  
City of London  
Sent via email only

23 September 2024

Dear Anastasia,

Letter in Response to Planning Application: 60 Gracechurch Street (ref:  
24/00743/FULEIA)

### Introduction

Further to a review of the submission documents and a prior pre-application meeting, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the emerging proposals for 60 Gracechurch Street.

### Background & Pre-application Discussion

We thank the project team for reaching out regarding pre-application discussion for the emerging scheme and for their time and thoughtful presentation.

We issued comment to the developer team in response to pre-application discussion. As the scheme is, in the main, unchanged from pre-application stage, much of our comment is repeated below.

### Relevant Planning Policy

#### 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 some consideration 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:

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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

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 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

Given the location of the scheme, potential visual and heritage impacts to the Cathedral from the Processional Way are of greatest concern. As previously raised with regards to the design development of the extant consent for 70 Gracechurch Street nearby, we would be strongly opposed to any proposals that impinge on these Processional Way views and kinetic experience, that (if found) would have the potential to cause a high level of

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visual impact and heritage harm to this Grade I listed building of exceptional significance.

We welcome discussion of potential impacts from the Processional Way within the submission material and our pre-application meeting. The concept of the 'cloak of invisibility' developed by MillerHare, and the adherence of the emerging scheme to this development envelope, is welcome. As discussed, we still seek assurances that the proposals will absolutely not be visible in these views. To be clearest, we would object to any 'technical visibility' so often discussed in relation to proposals of this nature.

We therefore welcome sight of MillerHare's methodology for this 'invisibility' envelope, including both technical and non-technical summaries to be reassured that our understanding of the proposal is correct and there will be absolutely no visibility from the Processional Way. We request that Officers interrogate this material accordingly and welcome its inclusion in the proposals.

As the applicant made clear in the materials shared, the proposal for this major tower will also be appreciable in views from the south west where the Cathedral is visible. These include LVMF view 15B.2, where the cluster appears to the viewer to the right-hand side of the Cathedral.

LVMF guidance for this view states that 'New tall buildings should seek to complement the City's eastern cluster of tall buildings with buildings of a height appropriate to their site and of high architectural design quality' and ultimately that development proposals maintain the visual prominence of the Cathedral and not diminish the ability to appreciate the building as a Strategically Important Landmark.

From recent experiences (and discussion in our pre-application meeting) we acknowledge the rate of development within the cluster – especially those constructed and consented schemes between 20 Fenchurch Street (the Walkie Talkie) and the centre of the cluster. Many of these are located along Gracechurch Street, now including No. 60.

It was helpful to understand from the submission materials and the pre-application presentation how proposals fit within this emerging context. However, following consideration, we have some concerns regarding the height and massing of the proposals in relation to the overall urban form of the cluster. While these are predominantly view management and urban

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design considerations (with relevance to important views of the Cathedral, within which St Paul's is appreciable as a Strategically Important Landmark), this does not preclude the potential for heritage harm – which officers should interrogate and judge accordingly.

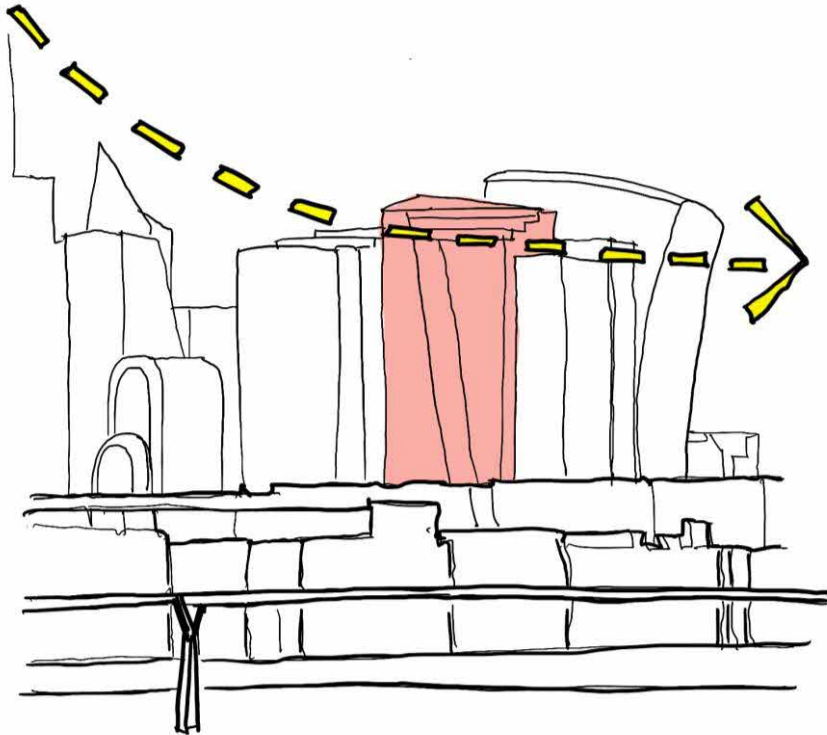
As described, the height of the emerging proposals for No. 60 attempts to mediate between the consented 70 Gracechurch Street and extant 20 Fenchurch Street.

Our concern remains that there appears to be a lost opportunity to manage the urban form of the cluster appropriately. We suggest that the Walkie-talkie (which is in the background) should not appear to be a 'target' for the scale of these new buildings. We would encourage design exploration of proposals mediating between the consented 70 Gracechurch Street and the nearby, lower, 55 Gracechurch. We also suggest that design dialogue should take into account the now live planning application for 70 Gracechurch Street.

While 20 Fenchurch Street does indeed stand out markedly at this edge of the cluster, we would be concerned of proposals responding to its height and creating a very tall 'wall' of buildings along Gracechurch Street. This would effectively reinforce a hard datum to urban form, almost a plateau rather than a gentler descending gradient to the cluster's edge (see below extract and LVMF view 15B.1, cumulative and proposed).

Please note, the below extracts of rendered views are taken from pre-application images, as only wirelines of the consented and emerging baseline are provided within the application documents.

The sketch immediately below has been prepared by the Surveyor's Office following pre-application discussion.



We suggest that the relationships between these proposals are not satisfactorily coordinated within the general design aspirations and policy intent of the Cluster. Whilst some may feel that the built form of cluster has the appearance of a ‘massing and architecture competition’, with each new major development seeking to out-compete a neighbour, we have always understood that the planning authority has an eye for overall form, urban design, and overall quality – especially as this impacts public amenity in key views. Policy CS14 of the adopted 2015 Local Plan states proposals must have due 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 is mirrored more broadly within Policy CS10 Design. Indeed, whilst not yet adopted, the Draft City Plan 2040 also mentions at Policy S12 Tall Buildings that new development should ‘not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and townscape character, creating a coherent cluster form.’

What appears to be emerging with the recent sequence of developments for Gracechurch street does not appear to be measured and ordered with

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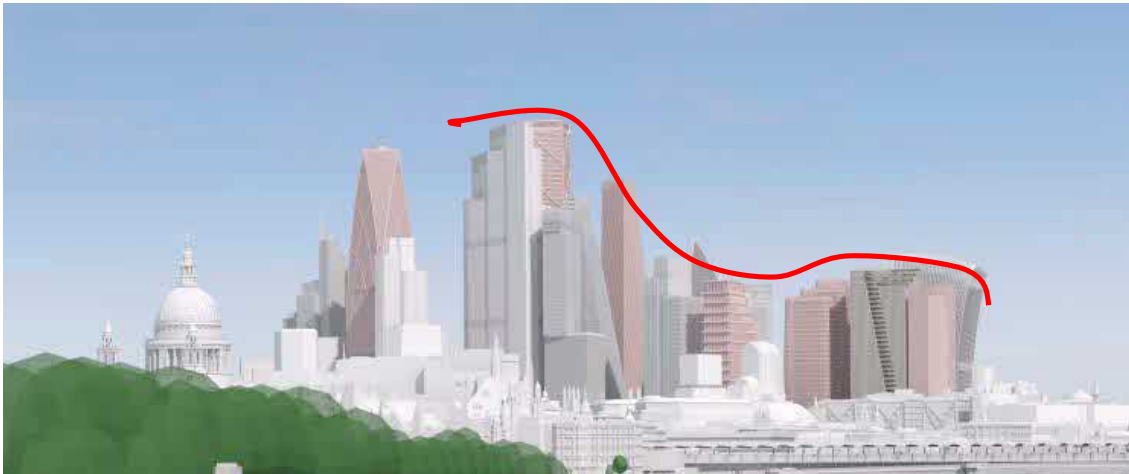
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 **St PAUL'S**  
CATHEDRAL

an eye to urban design of the skyline and topography in relation to the river Thames. This sequence seems to be a bulky wall 'infilling' to the scale and mass of the Walkie Talkie; ending in a cliff-edge. Is there not a more considered approach needed; some deliberation and judgement?



Broadly, our thesis is that the urban form of the cluster should be tailing off to the river as indicated by the overlaid line, with the Walkie-Talkie as the background, not making a camel's 'hump' and a cliff-edge.



It is stated that the proposals would be compliant with emerging policy in the 2040 Local Plan – though we here note we have our own queries and concerns as to the nature of this policy that are yet to be resolved. In the interim, we would hope that development aligns with the spirit of established policy that has informed the development of the cluster to date – namely that new development maintains and contributes to an appropriate gradient of urban form with design deliberation and care. We

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feel this is in line with the language of the LVMF noted above that new development 'should seek to complement the City's eastern cluster of tall buildings with buildings of a height appropriate to their site.'

We are not persuaded that this aim is achieved in letter or spirit with this proposal, and that the proposals would not have minor adverse visual and townscape affects.

#### Conclusion

We again thank the project team for their time and effort with regards to their pre-application engagement, and the inclusion of additional and specific information within the planning submission to respond to some of our comments.

We also warmly welcome the ethos of the project team with regards to their clear investment in the site and its long-term prospects. Given these considerations, our comments are intended to assist the project team's aspirations and investment for the site in the long term.

However, we do have concern regarding the way the proposals would respond to the current and emerging context in terms of urban design, and as appreciable in strategic and local views.

We hope that our comments are constructive and assist the project team, and Officers at the City, moving forward.

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

# 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 27 September 2024  
Our Ref 24/04353/NPLN  
Your Ref 24/00743/FULEIA

Subject Allianz House 60 Gracechurch Street London EC3V 0HR

**Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).**

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

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.

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The office 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 and not at any time on Sundays or Bank Holidays, other than in the case of emergency. The public 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

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.

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.

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 proposed café/bar 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.

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: 

# Memo

To Assistant Director (Development Management)  
Environment Department

Email [REDACTED]



From Kyri Eleftheriou-Vaus  
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date 7/10/24

Your Ref: 24/00743/FULEIA

**Subject:** Allianz House 60 Gracechurch Street London EC3V 0HR

Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.

## Pollutant emissions

The proposed development will have one disabled car parking space and is planned to be fossil-fuel free with no combustion on-site; heating will be through air source heat pumps which is welcome.

A Utility Statement (July 24) states it is proposed that two new incoming power supplies from two independent UKPN primary substations will be provided. This allows for the removal of standby diesel generators for the building, both for life safety and mains failure.

Based on the CoL Code of Practice for Deconstruction and Construction Sites, the Site is considered to be a 'high risk' site and therefore appropriate mitigation measures to control dust are to be adopted as laid out in Air Quality Appendix, Annex 6 Construction Mitigation.

The service and delivery vehicles are the only source of pollutant emissions during the operational life of the development as no operational combustion plant is proposed. The transport statement states that the proposed site would generate 119 servicing vehicles per day. However off-site freight consolidation is expected to reduce the number of servicing vehicle trips by at least 75%, approximately 30 vehicles per day.

### **Air Quality Neutral**

The development meets both the transport and building emissions for the Air Quality Neutral Assessment (taxi, servicing and delivery vehicles are excluded from this assessment).

### **Air Quality Positive**

The application is supported by an Air Quality Positive Statement. The air quality positive matrix should consider as many relevant measures as possible however it does not include a full range of measures.

The matrix contains a number of positive measures regarding cycling, sustainable travel, and no car parking provision; however, these measures are well established and are expected of any major development, not least an EIA development, within the City.

While referring to the proposal that there will be no diesel fired life-safety generators, it is not included in the matrix. As this is a positive measure which should be acknowledged as innovative/future-proofing it should be included in the matrix. To ensure that no diesel generators are installed in the future, I recommend that a compliance condition that would restrict their installation.

Separately an Outline Delivery and Servicing Plan has been prepared which states it will 'manage deliveries and servicing activity by: Ensuring deliveries are undertaken with the most appropriately sized vehicle, with an emphasis on sustainable freight, last-mile deliveries, coordination within the Site occupiers and with other schemes, in the local area to consolidate deliveries, where possible'.

However, there is no mention of the Outline Delivery and Service Plan within the AQ positive statement. As this offers the only means of limiting the impact of these vehicles on pollutant and carbon emissions and ensuring that the predicted increase in vehicles do not breach impact assessment levels this should be addressed in the assessment.

As a very significant reduction of 75% is predicted through consolidation a greater commitment to this aim is required and methods to monitor the scheme is vital to ensure that it is achieved. In addition, measures which provide improved facilities and access to the site will enable greater numbers of sustainable deliveries by cargo bikes, cycles and by foot. For example, dedicated stands/loading and unloading zones for cargo bikes will aid such deliveries. These measures should be included in the Air Quality Positive Statement.

Should the development be approved please attach the following conditions:

#### **Air Quality Positive Assessment**

A revised Air Quality Positive Assessment that includes all the proposed measures including proposed systems, and monitoring, of the measures undertaken to reduce the number of servicing vehicle trips by at least 75% and measures that incorporate dedicated stands/loading and unloading zones for cargo bikes be submitted.

#### **Reason**

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(b, and d) of the London Plan

#### **Generators**

There shall be no installation of diesel generators to the building he

#### **Reason**

In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

#### **Condition M32 NRMM**

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

#### **Reason**

To reduce the emissions of construction and demolition in accord.  
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/government/topics/medium-combustion-plants-and-specified-generators)



Tel: 020 8921 5222



Anastasia Tampouridou  
City of London  
PO Box 270  
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London  
EC2P 2EJ  
**24/2578/K**

**Directorate of Regeneration,  
Enterprise & Skills**  
The Woolwich Centre, 5th Floor  
35 Wellington Street  
London, SE18 6HQ

09 October 2024

## DECISION NOTICE –RAISE NO OBJECTION

Dear Sir/Madam,

**Site:** Allianz House 60 Gracechurch Street London EC3V 0HR  
**Applicant:** Anastasia Tampouridou City of London  
**Proposal:** Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).  
**Drawings** Email from City Of London & Email from City Of London (PDF).

I refer to your letter dated 23 July 2024 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

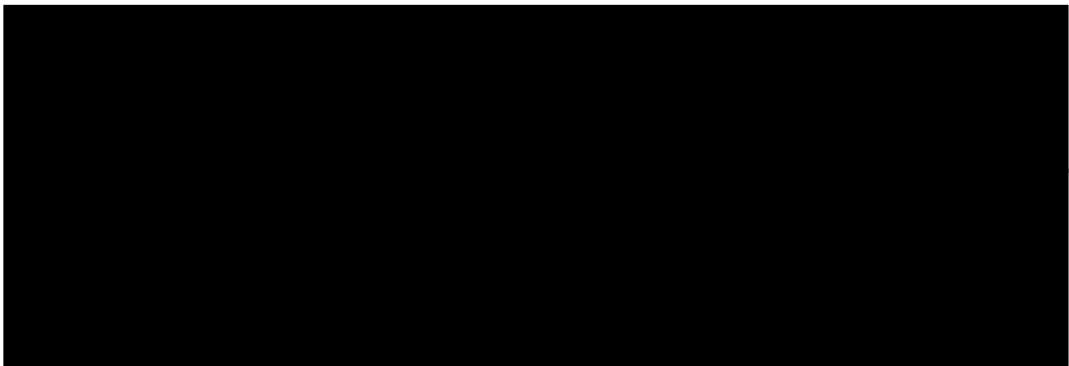
The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully



Assistant Director



---

From: Bell, Harriet [redacted]  
Sent: Thursday, October 10, 2024 2:06 AM  
To: Tampouridou, Anastasia [redacted]  
Subject: 60 Gracechurch St

Hi,

Comments for now.

- Note that there is a full **Access Statement** as part of the DAS
- Recognise **value of sensorial mapping** which has a greater focus on a holistic experience of the site and the potential to be more inclusive of a greater range of people than existing regulations allow. However, it's not clear how relevant disabled persons' and other relevant groups have been engaged and integrated into this (London plan D5)
- Welcome **biophilic focus** and engagement with nature (PAS 6463)
- Recognise the ambition of the **undercroft providing a space to move away from busy access routes** and provide a degree of respite, which echoes the focus of PAS 6463 on places for restoration and recovery
- Step free public transport from train to street is not available within 50m of the site, although there is greater proximity for bus stops. It should be noted that public transport is not suitable for everyone. **Resting points** at every 50m along principal access routes from points of arrival should be identified as set out in BS 8300(1) and Inclusive Mobility –is there potential for S106 works to provide more where missing? Refer to Transport team for information on where benches are 'missing'?
- No public **Blue Badge** bays nearby –off street space is consequently the more important. Welcome off-street provision even though it means the undercroft and vehicle movement will have to be carefully managed. Note protection zone is shown to driver side and rear of vehicle.
- Owing to the lack of parking within 50m of the main entrances **setting down** will be important. BS 8300 (1) 6.1 recommends a designated setting down space. Has this been identified?
- **Cycle parking.** Good clear entrance and the three cycle lifts avoid separation. Note what's said in Access Statement regarding dimensions of cycle lifts. Would be helpful to have those confirmed and are the security gates all 1000mm like doors on cycle lifts (LCDS Ch.8)? There are no further doors to the cycle storage, but the route to the accessible end of trip facilities on B1 includes more than two doors. Can we

have confirmation that these will be automated? Some of the larger cycle stands are at some distance from the lifts which may disadvantage some cyclists with mobility impairments. Can they be clustered so as to reduce travel distances? Can we also have swept paths for the larger cycle storage bays - not sure how, e.g., 3 spaces to east of passenger lift would work?

- **End of trip facilities** Welcome that accessible shower is provided on same level as storage, as well as on B1 mezzanine, but if only one accessible facility is provided at this level, right hand transfer would be suitable for more people. See Diagram 24 of AD M(2). Suggesting reversing what's shown in terms of B1 and B1 mezzanine provision. Toilets need to be consistent with AD M and updated AD T –note that ambulant accessible toilets are identified. Will want more on detail of toilets later. People should not have to travel more than 40m to an AWC, as confirmed.
- It is regrettable that no **mobility scooter storage and charging** is currently shown, with associated EV charging provision and fire protection. Has this been investigated further?
- **Entrances** –p.206 of DAD describes '**revolving drum doors**'. Not sure what's intended? The following text would suggest they mean drum doors, rather than standard revolving doors, which are not inclusive of many people. Drum doors are significantly more inclusive. Will need to reserve details of the design but, in principle, this is welcome.
- **Feature stair and lift–how will the experience be made equitable for people who need to use step-free access** as the northern entrance has a feature amphistair and the southern entrance is stepped, with a platform lift shared by people requiring step-free routes, and the movement of refuse. How will design of the lifts and amphistair ensure that step-free routes are intuitive and a comparable, welcoming experience? Need to review sightlines as well as signage, lighting and materials to ensure that step-free access doesn't equate to a lesser experience. At present there is unwelcome separation (LP D5 3.5.9).
- There are particular concerns about the **platform lift** to the south. Traditional platform lifts are not suitable for a range of people. AD M2 says that they should only be used for existing buildings and in 'exceptional' circumstances (AD M(2) 3.22)What options –including ramp and passenger lifts were explored and why were they discounted? What kind of platform lift is proposed? Need more justification here.
- **The route to the viewing gallery lift** is down the end of a corridor. I have concerns about the potential number of visitors and congestion in this area. This will need careful management to limit potential for fatigue and sensory overload. How will this be managed (queuing etc?). Seating? We will also need to see the management protocol for the shared goods/passenger functioning of the lift.
- Although indicative, the café **tables in the entrance access route** as shown would obstruct access to the toilets. A clear route of 2m should be maintained. I note that there is no Changing Places toilet included, which is regrettable. Can this be reviewed if one is not required as a consequence of visitor numbers (see AD m(2)? Baby change facilities should also be provided, separate to AWC toilets, as noted in the Access Statement
- Note what's said regarding an **evacuation lift**, firefighting/evacuation, and separate

firefighting lifts. Not all levels will have the separate lifts, as set out in the Fire Strategy. Refuge points look as though they won't project into access routes. Note what's said about audio and visual alarms, which is welcome. Two-way communication systems should also be provided.

- There's quite a lot that will need to be **reserved by condition** but I'm content that we have enough in the Access Statement to do that for:
  - Entrance doors
  - Reception
  - Café area and seating
  - Toilets –subject to clarification as above
  - Landscape including roof terraces, floor surfaces, planters, planting and threshold details
  - Seating including provision for recesses for wheelchair users and people with assistance animals to sit 'alongside'
  - Culture offer –including opportunities for disabled people
  - Wayfind and signage –which should be consistent and intuitive. This will be particularly important for the service corridor/access to viewing platform lift
  - Prior/preview information for visitors
  - Access Management Plan (which may incorporate some of the above) including provision for emergency exit such as preparation of PEEPs

Hope that's clear, but let me know if I've forgotten something or you want to discuss anything.

Thanks

Harriet



**Harriet Bell | Access Advisor (she/her)**

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

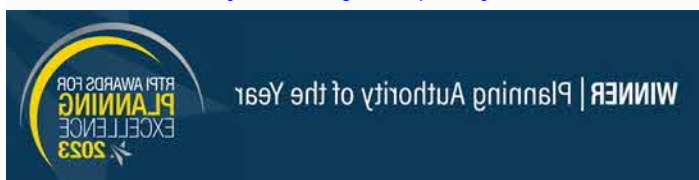


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Katie Stewart –Executive Director Environment

Please note that my working days are Tuesday-Friday

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**From:** [ROSSI, Sacha](#)  
**To:** [PLN - Comments](#)  
**Cc:** [NATS Safeguarding](#)  
**Subject:** RE: Planning Application Consultation: 24/00743/FULEIA [SG37619]  
**Date:** 22 October 2024 14:55:33  
**Attachments:** [image001.png](#)

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Dear Sirs,

NATS acknowledges receipt of the revised scheme and the alterations sought to the application. Its position remains unchanged from that previously communicated, and reiterated below.

Regards  
S. Rossi  
NATS Safeguarding Office

NATS Internal

**From:** NATS Safeguarding  
**Sent:** Friday, July 26, 2024 11:09 AM  
**To:** [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)  
**Cc:** NATS Safeguarding <[NATSSafeguarding@nats.co.uk](mailto:NATSSafeguarding@nats.co.uk)>  
**Subject:** RE: Planning Application Consultation: 24/00743/FULEIA [SG37619]

Dear Sirs, NATS has assessed the application and has identified an unacceptable impact upon its H10 radar located at Heathrow Airport.

Accordingly, should the LPA be minded to grant the scheme, NATS respectfully requests the imposition of the following planning conditions on any planning permission.

Regards  
S. Rossi  
NATS Safeguarding Office

#### **Aviation Conditions**

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

**REASON:**

In the interests of aircraft safety and the operations of NATS En-route PLC.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

**REASON:**

In the interests of aircraft safety and the operations of NATS En-route PLC.

3. No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator".

Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

**REASON:**

In the interests of aircraft safety and the operations of NATS En-route PLC.

For the purpose of conditions 1-3 above;

"Operator" means NATS (En Route) plc, incorporated under the Companies Act (4129273) whose registered office is 4000 Parkway, Whiteley, Fareham, Hants PO15 7FL or such other organisation licensed from time to time under sections 5 and 6 of the Transport Act 2000 to provide air traffic services to the relevant managed area (within the meaning of section 40 of that Act).

"Radar Mitigation Scheme" or "Scheme" means a detailed scheme agreed with the Operator which sets out the measures to be taken to avoid at all times the impact of the development on the H10 Primary and Secondary Surveillance radar and air traffic management operations of the Operator.

"Crane Operation Plan (COP)" means a detailed plan agreed with the Operator which defines the type of crane and the timing and duration of all crane works to be carried out at the site in order to manage and mitigate at all times the impact of the development on the H10 Primary and Secondary Surveillance Radar systems at Heathrow Airport and associated air traffic management operations of the Operator.



**Sacha Rossi**  
ATC Systems Safeguarding Engineer



4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL

[www.nats.co.uk](http://www.nats.co.uk)

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**From:** [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk) <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>  
**Sent:** Tuesday, October 22, 2024 12:53 PM  
**To:** NATS Safeguarding <[NATSSafeguarding@nats.co.uk](mailto:NATSSafeguarding@nats.co.uk)>  
**Subject:** Planning Application Consultation: 24/00743/FULEIA

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 Allianz House 60 Gracechurch Street London EC3V 0HR .  
Reply with your comments to [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk).

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou  
Environment Department  
City of London

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NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

---



**From:** [PlanningGatewayOne](#)  
**To:** [PLN - Comments](#)  
**Subject:** RE: Planning Application Consultation: 24/00743/FULEIA (Our ref pgo-6077)  
**Date:** 22 October 2024 15:55:14  
**Attachments:** [image001.png](#)

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THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Further information is available on the HSE website [here](#).

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-6077) in all future correspondence

Kind regards

*Lisa Gaskill*

**Operational Support for Planning Gateway One**  
Health and Safety Executive | Building Safety Division  
[PlanningGatewayOne@hse.gov.uk](mailto:PlanningGatewayOne@hse.gov.uk)



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

From: [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk) <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>  
Sent: Tuesday, October 22, 2024 12:56 PM  
To: [PlanningGatewayOne](mailto:PlanningGatewayOne@hse.gov.uk) <[PlanningGatewayOne@hse.gov.uk](mailto:PlanningGatewayOne@hse.gov.uk)>  
Subject: Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation for Allianz House 60 Gracechurch Street London EC3V 0HR .

Reply with your comments to [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk).

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou  
Environment Department  
City of London

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

**Application Reference:** 24/00743/FULEIA

**Site:** 60 Gracechurch Street

**Case Officer:** Anastasia Tampouridou

**Application Proposal:** Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (*sui generis*), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the 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 1<sup>st</sup> 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**

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£7,535,721.29	£7,234,292.43	£301,428.85

### **City CIL and S106 Planning Obligations**

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
<b>City CIL</b>	£3,336,000	£3,169,200	£166,800
<b>City Planning Obligations</b>			
Affordable Housing	£2,224,000	£2,201,760	£22,240
Local, Training, Skills and Job Brokerage	£1,334,400	£1,321,056	£13,344
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£512,785	£512,785	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£TBC	£	£0
Security Measures Contribution (Eastern City Cluster)	£444,800	£440,352	£4,448
S106 Monitoring Charge	£5,500	£0	£5,500
<b>Total liability in accordance with the City of London's policies</b>	<b>£</b>	<b>£</b>	<b>£212,332</b>

### 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
  - Employment and Skills Plan (Demolition / Construction)
  - Delivery and Servicing Management Plan (including Consolidation)
  - Active Travel Plan (including Cycling Promotion Plan)
  - Construction Monitoring Cost (£53,820 for first year of development and £46,460 for subsequent years)
  - A10 Transport for London Road Network (TLRN) improvement scheme contribution

(£729,869 BCIS index linked)

- Cycle Hire Contribution (£200,000)
  - Carbon Offsetting
  - 'Be Seen' Energy Performance Monitoring
  - Utility Connection Requirements
  - Section 278 Agreement (*CoL*)
  - Section 278 Agreement (*Transport for London*)
  - Public Viewing Gallery (Sanctuary and Roof Garden) (Public Access & Management Plan)
  - Management Plan for Learning Space
  - Public Realm Space (Specifications, Public Access & Management Plan)
  - Cultural Implementation Strategy
  - Television Interference Survey
  - Operational Management Plan for the Undercroft
  - Affordable Workspace Management Plan
  - Wind Audit
  - Solar Glare
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 X

#### 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.



LPA Ref: 24/00743/FULEIA

London City Airport Ref: 2024/LCY/244

Date: 23/10/2024

Dear Anastasia Tampouridou,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority are of a mind to approve this application, then London City Airport suggests the condition contained in this letter is added to any future approval.

<b>LPA Reference</b>	24/00743/FULEIA
<b>Proposal</b>	Re-consultation due to amendments. Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.
<b>Location</b>	Allianz House 60 Gracechurch Street London EC3V 0HR
<b>Borough</b>	City of London
<b>Case Officer</b>	Anastasia Tampouridou

London City Airport's response must change to an objection unless these conditions are applied to this planning permission.

### **Radar Mitigation Condition**

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

**REASON:** In the interests of aircraft safety and the operations of London City Airport.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

**REASON:** In the interests of aircraft safety and the operations of London City Airport.

3. No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator".

Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

**REASON:** In the interests of aircraft safety and the operations of London City Airport.

### **Permanent Obstacle Lighting Scheme**

Obstacle lights shall be placed on all corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

**Reason:** Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make you aware of the following:

### **CAA Building Notification**

As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

### **CAA Crane Notification:**

Where a building or crane is 100m or higher, developers and crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk).

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position



of any other party, whether they are 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 London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of London City Airport or not to attach conditions which London City Airport has advised, it shall notify London City Airport and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Kind regards,

**Lucy Dale**

On behalf of London City Airport

Anastasia Tampouridou  
Corporation Of London  
Development Plan  
PO Box 270  
London  
EC2P 2EJ

**Our ref:** NE/2024/137255/02  
**Your ref:** 24/00743/FULEIA  
**Date:** 23 October 2024

Dear Anastasia,

**Allianz House, 60 Gracechurch Street, London, EC3V 0HR**

**Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. Re-consultation due to amendments.**

Thank you for reconsulting us on the above application. Based on the information available, the application raises no environmental concerns for us. We therefore have **no comments** on this application, however, please consider the following advice.

### **Water Resources**

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

### **Pre Application Advice**

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet

to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at [HNL SustainablePlaces@environment-agency.gov.uk](mailto:HNL SustainablePlaces@environment-agency.gov.uk).

**Final comments**

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

If you have any questions, please email me at [HNL SustainablePlaces@environment-agency.gov.uk](mailto:HNL SustainablePlaces@environment-agency.gov.uk), quoting the reference at the beginning of this letter.

Yours sincerely,

**Harry Scott**  
**Planning Advisor**

E-mail: [HNL SustainablePlaces@environment-agency.gov.uk](mailto:HNL SustainablePlaces@environment-agency.gov.uk)  
Telephone: 02030251774

Anastasia Tampouridou  
City of London  
By email

Heathrow Airport Limited  
Airside Operations Facility  
Heathrow Airport  
Hounslow, Middlesex TW6 2GW  
Tel: +44(0) 208 757 0887  
Email: Safeguarding@Heathrow.com

24/10/24

Dear Anastasia,

**Re: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA). Re-consultation due to amendments.**

**Location: Allianz House 60 Gracechurch Street London EC3V 0HR.**

**Planning Reference: 24/00743/FULEIA**

**Our Ref: LHR6062**

We refer to your letter dated 22 October 2024, received in this office on the same day.

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below:

**H10 Radar Mitigation Condition**

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

**REASON:** In the interests of aircraft safety and the operations of Heathrow airport.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

**REASON:** In the interests of aircraft safety and the operations of Heathrow airport.

3. No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator". Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

**REASON:** In the interests of aircraft safety and the operations of Heathrow airport.

**We will need to object to this proposal unless the above-mentioned condition is applied to any planning permission.**

We would also like to bring the following to your attention:

**CAA Building Notification**

If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London is required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 ‘Safeguarding of Aerodromes & Military Explosives Storage Areas’.

**CAA Crane Notification**

Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Yours sincerely

Simon Vince  
For and on behalf of Heathrow Airport Limited



[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

Transport for London  
Crossrail Safeguarding  
5 Endeavour Square  
LONDON  
E20 1JN

25 October 2024  
Crossrail Ref: CRL-IP-3302

Dear Anastasia Tampouridou,

**24/00743/FULEIA : Allianz House 60 Gracechurch Street London EC3V 0HR**

*Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA). Re-consultation due to amendments..*

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 22 October 2024, requesting the views of CRL\_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:  
[CRL\\_Safeguarding@tfl.gov.uk](mailto:CRL_Safeguarding@tfl.gov.uk)

Yours sincerely,

**Will Orlik**  
Safeguarding Officer (Elizabeth line)  
[CRL\\_Safeguarding@tfl.gov.uk](mailto: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](mailto: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).

Memo

To Assistant Director (Development Management)  
Department of the Built Environment

From District Surveyors Office  
Environment Department

Telephone [REDACTED]

Email [REDACTED]



Date 28 October 2024

Our Ref DS/FS24/0051

Your Ref PT\_AXT/24/00743/FULEIA

Subject Allianz House 60 Gracechurch Street London EC3V 0HR

**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 submitted fire statement and have no comments.

I consider that policies D5 and D12 have been met.

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

**Application Reference:** 24/00743/FULEIA

**Site:** 60 Gracechurch Street

**Case Officer:** Anastasia Tampouridou

**Application Proposal:** Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (*sui generis*), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the 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 1<sup>st</sup> 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
<b>MCIL2 payable</b>	£7,535,721.29	£7,234,292.43	£301,428.85

### 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
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<b>City Planning Obligations</b>			



Affordable Housing	£2,224,000	£2,201,760	£22,240
Local, Training, Skills and Job Brokerage	£1,334,400	£1,321,056	£13,344
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£512,785	£512,785	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£TBC	£	£0
Security Measures Contribution (Eastern City Cluster)	£444,800	£440,352	£4,448
S106 Monitoring Charge	£5,500	£0	£5,500
<b>Total liability in accordance with the City of London's policies</b>	<b>£</b>	<b>£</b>	<b>£212,332</b>

### 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
- Employment and Skills Plan (Demolition / Construction)
- Delivery and Servicing Management Plan (including Consolidation)
- Active Travel Plan (including Cycling Promotion Plan)
- Car Parking Management Plan (including Passive Electric Vehicle Charging Point)
- Construction Monitoring Cost (£53,820 for first year of development and £46,460 for subsequent years)
- A10 Transport for London Road Network (TLRN) improvement scheme contribution (£729,869 BCIS index linked)
- Cycle Hire Contribution (£200,000)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring

- Utility Connection Requirements
  - Section 278 Agreement (*CoL*)
  - Section 278 Agreement (*Transport for London*)
  - Public Viewing Gallery (Sanctuary and Roof Garden) (Public Access & Management Plan)
  - Management Plan for Learning Space
  - Public Realm Space (Specifications, Public Access & Management Plan)
  - Cultural Implementation Strategy
  - Television Interference Survey
  - Operational Management Plan for the Undercroft
  - Wind Audit
  - Solar Glare
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 X

Monitoring and Administrative Costs

8. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
9. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

# Memo



**To** Department of Planning & Transportation

**From** Paul Jones

City Operations Division

Environment Department

**Telephone** 0207 332 1545

**Email** paul.jones@cityoflondon.gov.uk

**Date** 31 October 2024

**Subject** GREASE TRAP REQUIREMENT

**For action**

Application PT\_AXT/24/00743/FULEIA

Address: **Allianz House, 60 Gracechurch Street, London EC3V 0HR**

Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, the proposals for the above planning application, need to comply with the requirements of the Sewerage Undertaker (Thames Water Utilities Ltd), these being;

ANY BUILDING PROPOSAL WHICH INCLUDES CATERING FACILITIES WILL BE REQUIRED TO BE CONSTRUCTED WITH ADEQUATE GREASE TRAPS TO THE SATISFACTION OF THAMES WATER UTILITIES LTD OR THEIR CONTRACTORS.

I would be obliged if you could incorporate this in your response to the planning department, regarding this application.

Paul Jones

**From:**  
**To:**  
**Subject:** Planning Application Consultation: 24/00743/FULEIA  
**Date:** 04 November 2024 11:25:35  
**Attachments:**

---

THIS IS AN EXTERNAL EMAIL

Dear Anastasia Tampouridou

Our ref: **491890**

Your ref: **24/00743/FULEIA**

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our response dated **26 July 2024** reference number **483338**

The advice provided in our previous response applies equally to this **amendment** The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully

**David Reid**

Officer

Natural England

Consultation Service

Natural England, County Hall, Spetchley Road, Worcester, U.K., WR5 2NP

Email:



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

From: [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk) <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>

Sent: 22 October 2024 12:51

To: SM-NE-Consultations (NE)

Subject: Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation for Allianz House 60 Gracechurch Street London EC3V 0HR .  
Reply with your comments to [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk).

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou  
Environment Department  
City of London

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**From:**  
**To:**  
**Cc:**  
**Subject:** FW: 24/00743/FULEIA - Allianz House 60 Gracechurch Street London EC3V 0HR  
**Date:** 05 November 2024 10:50:30  
**Attachments:** [ufm92\\_English\\_Heritage\\_Consultation\\_Email.pdf](#)  
[60 Gracechurch Street rec cond\\_222477.pdf](#)

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H Anastasia

Thank you for reconsulting me on this application. The proposed amendments do not affect my previous advice, which I have reattached for information

Regards

Helen



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

**From:** PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

**Sent:** 22 October 2024 12:

**To:** E-Glaas <

**Subject:** 24/00743/FULEIA - Allianz House 60 Gracechurch Street London EC3V 0HR

-- 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=SGGVKXFHL6A00>

Kind Regards

Planning Administration  
Environment Department  
City of London Corporation

On behalf of

Anastasia Tampouridou

Details

OUR REF: 24/00743/FULEIA

ADDRESS: Allianz House 60 Gracechurch Street London EC3V 0HR (Grid Reference: 532979, 180921)

PROPOSAL: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

Re-consultation due to amendments.

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Your ref:  
My ref: 24/07358/OBS

**Please reply to:** Nikki Mitchell  
Tel No: [REDACTED]  
Email: [REDACTED]

**Town Planning & Building Control**  
Westminster City Council  
PO Box 732  
Redhill, RH1 9FL

6 November 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.:** 24/07358/OBS                      **Application Date:**  
**Date Received:** 22.10.2024                      **Date Amended:** 22.10.2024

**Plan Nos:** Letter from City of London dated 22 October 2024.

**Address:** Allianz House, 60 Gracechurch Street, City Of London, London

**Proposal:** Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA). Re-consultation due to amendments.

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.



# SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0050

Date of issue of this decision: 15/11/2024



www.southwark.gov.uk

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LBS Reg. No.: 24/OB/0050  
Your Ref No.:

Date of Issue of Decision: 15/11/2024

---

Applicant Anastasia Tampouridou - City Planning  
City of London

## **NO COMMENTS made in reference to your consultation on the following development:**

Re consultation for Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M

At Allianz House 60 Gracechurch Street London EC3V 0HR

In accordance with your letter received on 28 October 2024 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

[REDACTED]

---

From: Gregory Barrett [REDACTED]

Sent: 19 November 2024 07:35

To: Tampouridou, Anastasia [REDACTED]

[REDACTED]  
[REDACTED] >

Subject: Allianz House 60 Gracechurch Street London EC3V 0HR (ref: 24/00743/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Anastasia,

Many thanks for notifying the Cathedral of updated proposals for 60 Gracechurch Street.

Following review of the updated proposals, we would note that our previous comments still stand –though we welcome attempts to positively respond to the cluster context.

In addition, we would register concerns regarding any increase in visual impact at night as a result of changes to the detail of the façade and the proposed lighting strategy. We therefore consider that ‘architectural’ external lighting, as appears to be indicated within the scheme, would not be required.

We would be happy to discuss this further with City Officers to understand impacts, if helpful.

Kind regards,

Greg

**Gregory Barrett**

BA (Hons) MPhil (Cantab) FRSA IHBC

Lead Heritage Consultant and Clerk to the Surveyor

[REDACTED]

on behalf of Caroe Architecture Ltd

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From: James Lerpiniere <[REDACTED]>  
Sent: 20 November 2024 13:12  
To: Tampouridou, Anastasia <[REDACTED]>  
Cc: Ronald Henry <[REDACTED]>; Daniel Hiscock  
<[REDACTED]>  
Subject: 60 Gracechurch Street - 24/00743/FULEIA  
Importance: High

Good afternoon Anastasia,

Many thanks for your email, and for keeping us abreast of this planning application.

Please find my comments (in yellow) attached (attachment two...CTSA response to 60 Gracechurch Street planning). In short I am very happy with the way things are progressing as the security consultant appears to have taken my advice onboard, and appears to be progressing things nicely.

My only concern is that a Counter Terrorism Risk Assessment (CTRA) hasn't been carried out, and whilst this isn't a condition of this planning application, remains good practice. I note that an SNA has been carried out, however this is to assess the security needs of the building/area, much of this centring around crime, rather than specific threats/vulnerabilities to this building. That said I do still advise a CTRA to be carried out. I am more than happy to meet with the consultant regarding this, should it be required.

Reference the HVM condition. I note that the following has been suggested...

HVM:

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

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

I have seen a few of these conditions now and being new to the City of London wasn't sure where these were coming from. I now understand these to be coming from the transport team within the CoLC.

Should a development require a Counter Terrorism condition, then best practice is for this to be recommended by a CTSA. The reason for this is that we can ensure that the correct condition(s) are being made in the right instances, that they are worded in such a way to insure the correct mitigation measures are being stipulated, that the work required to meet the condition is being carried by the right people (in this instance a suitably qualified blast specialist), that all related vulnerabilities are being considered (in this instance the structure may not be the only element vulnerable to a blast, the glazing and other material such as cladding may also be vulnerable) and the condition is written in such a way that it can be suitably discharged by the right people (the last couple have come to our team).

We are proposing a meeting with the CoLC to discuss this, hopefully to find a suitable way forward, however in the interest of our very tight deadline please can I suggest that, should you still require the above condition to be made, that this is replaced with the following:

The development shall instal blast mitigation measures, informed through consultation with a suitably qualified Structural Blast Engineer (SBE) from the Register of Security Engineers and Specialists (RSES). This will help to reduce this sites vulnerability to the effects of blast.

The SBE will help inform both the design and mitigation by:

1. Evaluating the buildings envelope for effects relating to air blast (including exterior walling systems, exterior and interior glazing and roofing systems) at varying explosive device sizes (i.e. VBIED and placed device attack) and pre-determined stand-off distances.
2. Providing performance specifications for pre-manufactured systems subject to air-blast loading (i.e. precast panels, windows etc.)
3. Providing specialist advice to the structural engineer and other design team members on incorporating blast analysis results into the buildings design.

Note: This will still remain a CoLC initiated condition at this time.

From reading the attached this appears very much in hand by the security consultant, therefore I can't envisage any problems with this at this time.

I hope this all makes sense, and helps. Should you have any questions please don't hesitate to make contact with me.

Kind regards

James

James Lerpiniere LCGI  
Counter Terrorism Security Advisor  
Counter Terrorism | City of London Police

T [REDACTED]

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From: Tampouridou, Anastasia <[REDACTED]>  
Sent: 15 November 2024 08:57  
To: James Lerpiniere <[REDACTED]>  
Cc: Daniel Hiscock <[REDACTED]>  
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA  
Importance: High

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Hi James,

The applicant responses are in the attached email following your memo and a couple of my points. I would be grateful if you could have a look and let me know if this is to your satisfaction.

We are securing an HVM condition and operation and management plans for the public areas of the building under S.106 agreement. If there are any planning conditions you would like to recommend, please let me know so I can take that into consideration. Otherwise, I have already included the standard informative which informs the development to engage further with CTSA at a later design stage.

I am submitting my report next week, so it'd be appreciated if I could have CTSA's final response beforehand so I can add it there.

Many thanks,  
Anastasia

From: James Lerpiniere <[REDACTED]>  
Sent: 25 October 2024 14:42  
To: Tampouridou, Anastasia <[REDACTED]>  
Cc: Daniel Hiscock <[REDACTED]>  
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA

Thanks Anastasia,

I will await your response. Please can you also CC my colleague Daniel Hiscock in.

Kind regards  
James

**James Lerpiniere LCGI**  
**Counter Terrorism Security Advisor**  
Counter Terrorism | City of London Police  
T [REDACTED]

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---

From: Tampouridou, Anastasia <[REDACTED]>  
Sent: 25 October 2024 12:13  
To: James Lerpiniere <[REDACTED]>  
Cc: Kelly Hemmise <[REDACTED]>; Ronald Henry <[REDACTED]>; Russell Pengelly <[REDACTED]>  
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA

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Thank you very much for your response James.

I have asked the applicant to clarify if the HVM restrictions identified in May remain



outstanding in the current submission and how CTSA's recommendations are being met. I am also waiting some clarifications on the consideration of blast mitigation in the design (materials) and further details on the access control system for the visitors of the public spaces at level 35 to demonstrate a secure flow of people and no external queuing.

These are the areas I identified as being planning material. I will happily report back to you when I have more information on these areas. Please do let me know if there is anything else you would like us to cover at planning stage, or if you would be satisfied with our standard recommendation as outlined in my previous email, below.

Kind regards,  
Anastasia

---

From: James Lerpiniere <[REDACTED]>  
Sent: 24 October 2024 12:45  
To: Tampouridou, Anastasia <[REDACTED]>  
Cc: Kelly Hemmise <[REDACTED]>; Ronald Henry <[REDACTED]>; Russell Pengelly <[REDACTED]>  
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA

Good afternoon Anastasia

Many thanks for your email.

I provided CTSA advice on this project back in May. Please find this attached (please note that this isn't for the public domain).

As you can see I made some comments around the need for HVM (page 4). I was advised that a Vehicle Dynamic Assessment (VDA), in order to assess what appropriate HVM measures were required, was carried out, however that there were restrictions regarding such mitigation. I advised that we met separately regarding this but I didn't hear back.

I am more than happy to attend a meeting, should this be require, however I am on leave after tomorrow for a week and understand that timings are now quite tight.

Please let me know.

Kind regards  
James

**James Lerpiniere LCGI**  
**Counter Terrorism Security Advisor**  
Counter Terrorism | City of London Police  
T [REDACTED]

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From: Kelly Hemmise <[REDACTED]>  
Sent: 24 October 2024 11:43  
To: James Lerpiniere <[REDACTED]>  
Cc: Ronald Henry <[REDACTED]>; Russell Pengelly <[REDACTED]>  
Subject: FW: 60 Gracechurch Street - 24/00743/FULEIA

James –please see below.

I think you dealt with this back in May.

Kind regards,

Kelly.

**Kelly Hemmise LCGI (she / her)**  
**Counter Terrorism Security Advisor**  
Counter Terrorism | City of London Police  
T [REDACTED]

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From: Tampouridou, Anastasia <[REDACTED]>  
Sent: 23 October 2024 14:58  
To: Doco <[REDACTED]>  
Cc: Russell Pengelly <[REDACTED]>; Ronald Henry <[REDACTED]>; Kelly Hemmise <[REDACTED]>  
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA

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Hi all –just copied some more contacts I found in my previous inbox. I am looking for some feedback regarding the above EIA planning application which is going to our committee for determination on 6<sup>th</sup> December. It would be great if City Police could provide some feedback on the security of the proposed development (included in the submitted Planning Statement, available online). The submission mentions that the proposed development would be protected by a 'security line', which has been designed in consultation with the City of London Police and includes measures for Hostile Vehicle Mitigation (HVM).

The development incorporated a public realm area underneath the building directly accessed from Gracechurch Street. This area would be accessible by car as it will form a loading area by night and a public space with sitting and accessible car parking by day. At level 35 a new public terrace would be formed alongside a learning space for schools' usage. Our recommendation would be to secure further details of the overall security strategy including a management strategy for the ground level public realm area and level 35 terrace under condition/obligation.

It would be much appreciated if you could provide your feedback on the above before the end of next week, so we can incorporate it into our report for Member's consideration.

Kind regards,  
Anastasia

---

From: Tampouridou, Anastasia  
Sent: 10 October 2024 09:02  
To: Doco2 <[REDACTED]>  
Cc: Russell Pengelly <[REDACTED]>  
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA

Hello,

Apologies to email again but we would appreciate your feedback on the proposed scheme as soon as possible.

Kind regards,  
Anastasia

---

From: Tampouridou, Anastasia  
Sent: Tuesday, September 24, 2024 4:10 PM  
To: Doco2 <[REDACTED]>  
Cc: Russell Pengelly <[REDACTED]>  
Subject: 60 Gracechurch Street - 24/00743/FULEIA

Hello,

The Planning team consulted City Police and Counter-Terrorism advisors regarding the above application. Have you had the chance to review the submission documents and provide us with your feedback?

[24/00743/FULEIA | Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use \(Class E\), retail / cafe use \(Class E\), free publicly accessible area and learning space at level 35 \(sui generis\), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. \(PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA\). | Allianz House 60 Gracechurch Street London EC3V 0HR \(cityoflondon.gov.uk\)](#)

Kind regards,  
Anastasia



**Anastasia Tampouridou | Planning Officer (Development Management)**  
Environment Department | City of London | Guildhall | London EC2V 7HH

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Katie Stewart –Executive Director Environment



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**1. Undertake a Counter Terrorism Risk Assessment (CTRA) and Operational Requirement (OR).**

QCIC have completed a Security Needs Assessment (SNA).

That's fantastic that an SNA has been carried out, however I would still advise a full CTRA and OR be conducted, to inform of any threats and vulnerabilities, thus any proportionate mitigation measures required. The SNA can feed into these processes.

**2. Carry out a full HVM review, which should include a Counter Terrorism Risk Assessment to identify all areas vulnerable to a hostile vehicle attack, and a Vehicle Dynamic Assessment (VDA), to identify the appropriate standard and placement of HVM required.**

A full HVM review and Vehicle Dynamic Assessment (VDA) was completed. Vehicle-borne protective measures are being included which be developed in more detail at the next stage of design.

Action supported by CoLP CTSA's.

**3. Public areas should be designed to minimise opportunities for concealing items, which should see unnecessary furniture avoided.**

The public areas have been designed to limit and minimise opportunities for concealing items - this will be a specific consideration in the detailed design stage of the Undercroft, which will review the detailed layout and arrangement of any planters, recesses or ledges to minimise hidden spaces.

Action supported by CoLP CTSA's.

**4. Commission Explosive Consequence Analysis (ECA) to understand what effects a blast could have on this building. Blast mitigation measures should then be considered accordingly.**

A blast analysis has been completed for the scheme. This is a confidential document.

Action supported by CoLP CTSA's. Blast analysis to inform any blast mitigation measures.

**5. Consider where post and deliveries will be received, along with any security measures.**

Both post room and delivery location options have been considered within the design along with appropriate security measures, with the Post Room currently being accommodated at GF level, accessed via the secure cycle entrance. These spaces will be developed in more detail at the next stage of design, with further input from QCIC and the building management team.

Action supported by CoLP CTSA's.

**6. Implement a Security Control Room (SCR).**

A Security Control Room requirement is included within the design, currently located within the building management suite at L1. The Security Control Room shall act as a central command and control position for the security management team. This space shall also serve as a technical management and oversight building that allows for the central monitoring of all video-surveillance



cameras, security system alarm notifications, and other integrated security system activity. The Security Control Room will be developed in more detail at the next stage of design, with further input from QCIC and the building management team.

Action supported by CoLP CTSA's.

**7. Ensure adequate CCTV is installed for the purposes of detection and verification.**

Adequate CCTV will be installed for the purposes of detection and verification which will be developed in more detail at the next stage of design; the Security Needs Assessment (SNA) undertaken addresses this requirement.

Action supported by CoLP CTSA's, however the CTRA should be used to address this requirement.

**8. Ensure adequate security lighting is installed.**

The Security Needs Assessment (SNA) addresses this requirement. Adequate security lighting will be included and developed in more detail at the next stage of design. Luminaires, with suitable photometry (serving to reduce light spill and light pollution), and controlled using photo-electric cells, will be used to illuminate the public realm, including areas immediately adjacent to the buildings, all perimeter doors, and footpaths. Lighting elements shall be vandal resistant, with illuminated elements mounted no less than 2.5m from finished grade. Lighting across the development will be designed to levels as identified within BS 5489-1:2013. The lighting design will be completed by a certified Institute of Lighting Professional (ILP).

Action supported by CoLP CTSA's, however the CTRA should be used to address this requirement.

**9. Ensure adequate access control measures are installed for non-public areas.**

The Security Needs Assessment (SNA) addresses this requirement. Adequate access control measures will be installed in non-public areas and developed in more detail at the next stage of design. Control measures include 1) Free egress – exit button, lever, or push bar release; 2) Key – mechanical lock / thumb turn / latched bolts; 3) AACS – access control managed; door will be monitored for status.

Action supported by CoLP CTSA's, however the CTRA should be used to address this requirement.

**10. Ensure lockdown capability in the event of a security incident.**

The Security Needs Assessment (SNA) addresses this requirement. The building will be equipped with a dynamic lockdown function that shall control movement, access and egress or people around the building in direct response to an identified risk, threat or hazard that might impact on the safety and security of people and assets.

Action supported by CoLP CTSA's, however the CTRA should be used to address this requirement.

**11. Implement a Public Announcement (PA) system.**

This would be developed in more detail at the next stage of design

Action supported by CoLP CTSA's.

### 12. Mitigate against a Fire as Weapon (FAW) attack.

The Security Needs Assessment (SNA) addresses this requirement. As above, the building will be equipped with a dynamic lockdown function that shall control movement, access and egress or people around the building in direct response to an identified risk, threat (i.e. Marauding Terrorist Firearms Attack (MTFA)).

Action supported by CoLP CTSA's. Please can I just ensure you are working with the London Fire Brigade regarding this action.

### 13. Consider 'grey space' areas.

Further clarification required from CoL Police and CTSA on this point.

This site is encouraged to engage regarding any grey space areas which the site may have an impact on or impact from. This includes the period of time that the site is being built, so how the impact of any construction works may effect the security posture of any neighbouring properties/the local area. Examples include the removal of street furniture, which may be protecting other sites against the threat of a VAW attack, or the introduction of hoarding, which may have an effect on ingress/egress/dispersal routes.

Engagement around any grey spaces areas should continue once the building is operational, however this is something that the local CTSA team can facilitate.

#### Clarifications to facilitate report writing:

- I note the DAS HVM section responds to the attached CTSA advice (recommendation 2 of page 2). On page 4 CTSA advised 'that there were some HVM restrictions around the perimeter of the sit. A further meeting to discuss HVM is advised'. Can you please advise if these restrictions are present in the current submission and what these are?

During the pre-application meeting, QCIC set out the anticipated Hostile Vehicle Mitigation (HVM) solution for proposed development. The solution includes Vehicle Security Barriers (fixed and automatic) and Structural Goalpost Arrangement. The details on this are set out in the DAS. Final details on the product type and positioning of Vehicle Security Barriers (VSB) and Hostile Vehicle Mitigation (HVM) elements will be developed in more detail, and with further input from QCIC and the building management team, at the next stage of design.

Noted. Should you require any further input from the CoLP CTSA team then please don't hesitate to make contact.

- I understand a further meeting with CTSA has not been carried out, so it would be good to understand how CTSA's recommendations are being met.

CTSA letter stipulates 'recommendations' not 'requirements'. All CTSA recommendations have been reviewed and will be incorporated into the design as necessary.

Noted – thankyou.

- **Blast Mitigation – has the design (materials) considered blast mitigation?**

A blast analysis has been completed for the scheme. This is a confidential document.

Action supported by CoLP CTSA's. As above, the blast analysis should now inform any blast mitigation measures, including structural, glazing, and any associated material (i.e. cladding).

- **Where is the Security Control Room located in the plans?**

A Security Control Room requirement is included within the design, currently located within the building management suite at L1. The Security Control Room will be developed in more detail, and with further input from QCIC and the building management team, at the next stage of design.

Noted – thankyou.

- **What is the access control system for the site, especially for the public spaces?**

See response above. Adequate access control measures will be installed and developed in more detail at the next stage of design.

Noted – thankyou.

- **The submission mentions check-in within the Undercroft and scanning for controlled access to areas of level 35. Can you please elaborate a bit further on the control process? (incl. location of check in, scanning measures introduced – i.e. walk-through metal detectors or security staff checking and where these occur - option of personal item locker in case of restricted items identified through scanning or would visitors be denied access , etc). Having said that, has there been a robust analysis of the maximum number of visitors arriving at the same time which factors in the maximum time required to check in and go through all scan controls, lift capacity / travel time, maximum capacity at level 35 and time spend in the area (including the learning space visitors), etc. that demonstrates a good/secure flow and no queueing outside the building/on the footway?**

Whilst the security processes for the rooftop garden and associated spaces will be developed during future stages of design, the current proposals have allowed space for a security / check in reception on the GF, accessed directly from the Undercroft. This space provides secure access to the corridor which leads to the rooftop public spaces, offering direct and indirect surveillance alongside space allowances for metal detectors / supporting security rooms etc - this space is marked on the plans. The public rooftop spaces have been designed to accommodate 125 people, with lifting, access and supporting functions designed around this expected occupancy. The detail of this operation (as requested above) will need further analysis following the development of the public use(s) within the Proposed Development, but the spatial allowance has been sized according to the principles of operation outlined in the planning submission.

Noted – thankyou.

This detail would be reserved by a planning condition/obligation, which we suggest is required prior to occupation of the development. This would form part of the Public Viewing Gallery Public Access and Management Plan.

Not for CTSA's.



Anastasia Tampouridou  
City of London  
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EC2P 2EJ

Development Management  
Planning and Building Control  
Housing and Regeneration Directorate  
Tower Hamlets Town Hall  
160 Whitechapel Road  
London E1 1BJ  
[www.towerhamlets.gov.uk](http://www.towerhamlets.gov.uk)

**Application Number:** PA/24/01833  
**Your ref:** 24/00743/FULEIA

**Enquiries to:** Eleanor Downton  
**Tel:** [REDACTED]  
**Email:** [REDACTED]

20 November, 2024

Dear Anastasia Tampouridou,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

**OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY**

**Location  
Proposal**

Allianz House 60 Gracechurch Street London EC3V 0HR  
Observation requested by City of London for the Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).  
Re-consultation due to amendments.

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application. I would be grateful if you would take the observations set out above into consideration:-

1. **CITY OF LONDON REFS: 24/00743/FULEIA**

**TOWER HAMLETS REF: PA/24/01290**

**ADDRESS: Allianz House 60 Gracechurch Street London EC3V 0HR**



The best of London in one borough

**Tower Hamlets Council**  
Tower Hamlets Town Hall  
160 Whitechapel Road  
London  
E1 1BJ

## **PROPOSAL:**

Observation requested by City Of London for demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.

### **Re-consultation comments:**

**LBTH previously provided comments on the scheme on 14.20.2024, given the similarities with the current scheme, our previous comments reflect LBTH position. These comments are reprovided for ease below:**

#### **Comments:**

These proposals are for a new office-led tall building development on the intersection of Gracechurch Street and Fenchurch Street. The site is within the Easter (City) Cluster and within London's Central Activities Zone (CAZ).

The Councils' main considerations in respect of this application is the impact on the setting of the Tower Of London, World Heritage Site. The development will also likely be viewed from other locations within Tower Hamlets including The Tower Conservation Area.

The assessment should have regard to relevant LBTH guidance such as the following: Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020), Urban Structure and Characterisation Study (2009) and its Addendum (2016) and other relevant guidance, such as Conservation Area appraisals, design guides, supplementary planning documents and the Tower Hamlets Conservation Strategy.

In the submitted supporting document for the application, ES Volume II: Townscape Heritage and Visual Impact Assessment July 2024, the impact of the proposed building on different views of and from Tower Bridge and Tower of London, is demonstrated. In views 9, a wireline is used to demonstrate the proposed development in the backdrop of the bridge.

Development within the existing tall building cluster of the City of London is clearly visible within the setting of the World Heritage Site as seen in views 11 and 12. The impact on the Tower must be given special attention commensurate to its important designation. The Tower should not be dominated by new development close to it.

City of London Corporation should consider whether these should also be provided

as rendered views, as the Proposed Development is clearly visible alongside the massing of existing developments in the area. This is of even further importance as views 10 and 11 would experience a significant effect during operational development.

Additionally, it is unfortunate that the Applicant has not taken into account and provided the visibility from LBTH Borough Designated View 2 from Wapping Wall bridge to St Paul's Church (as shown in Figure 6 of Tower Hamlets Local Plan 2031), as requested in the LBTH consultation response to the Scoping Opinion Request.

In summary, the proposed building would exacerbate the existing harm caused to the setting of the Tower of London, and numerous other heritage assets within its context, by the tall buildings which form the city cluster. The proposal would expand the width of the cluster and therefore its perceived mass in the setting of the Scheduled Ancient Monument. We therefore object to the proposal due to the harm cause to the setting of the Tower of London.

ES Statement:

LBTH were previously consulted upon and provided a response to the EIA Scoping Opinion Request for the subject application site in June 2024. LBTH consultation responses to the Scoping Opinion Request have been referenced below where relevant.

With reference to Schedule 4(2) of the EIA Regulations, the ES includes an assessment of alternatives and design evolution in Chapter 3. Whilst LBTH expected to see more explicit reference to the consideration of alternative scale and massing when it comes to effects on the Tower of London World Heritage Site and Scheduled Monument, and Tower Bridge Grade I listed building and their settings, it has been noted that consideration to these receptors has been given through LVMF views as noted in paragraph 3.15 of Chapter 3.

The Environmental Statement (ES) concluded that the following aspects and matters that could affect LBTH will result in insignificant residual effects: Air Quality, Noise and Vibration, Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, Wind Microclimate, Climate Change, Heritage, Townscape and Visual Impact Assessment.

In the consultation response to the Scoping Opinion Request, LBTH listed cumulative schemes within their jurisdiction which should be taken into account in the assessments. It is unfortunate to see that none of those have been considered.

A Heritage, Townscape and Visual Impact Assessment (HTVIA) has been provided



within Volume 2 of the ES. The HTVIA follows an unusual format given that the effects during demolition and construction are provided in Chapter 7, before even understanding the baseline and scoping process of the relevant receptors.

The assessment concludes a minor adverse effect during demolition and construction and minor neutral effect during operational development on the Tower of London WHS, listed buildings within and the Tower Conservation Area. LBTH considers that the Applicant should have provided an assessment on each receptor so the residual effects can be clearly understood for distinct receptors and designations, however, the non-significant effects both during demolition and construction and operational development are agreed.

The HTVIA considers the impact on the following heritage receptors within LBTH: Tower of London World Heritage Site (WHS) and listed buildings within it, the Tower Conservation Area and Grade I Tower Bridge and its surrounds. The Tower of London's designation as Scheduled Monument is only mentioned, however, it appears that no assessment of that particular designation has been carried out. Similarly, it is not clear whether all listed buildings within the Tower of London as stated in paragraph 8.253 of the HTVIA have been considered in the assessment.

Views 10 and 11 would experience a significant effect during operational development leading to moderate to major beneficial. With regard to the visual impact assessment, the relevant receptors within LBTH include Views 12a, 12b and 12c, all which are located within the Tower of London. LBTH welcomes the use of winter photography for these views so that full impact from the Proposed Development can be understood.

Assessed views 12a, 12b and 12c would all experience non-significant effects, concluded as negligible to minor adverse effect during the demolition and construction phase. This would be the same for the cumulative assessment of demolition and construction for Views 12a and 12b while View 12c would experience no effect.#

All of the three views would experience negligible to minor neutral effect (non-significant) as a result of the operational development. This would be the same in the cumulative assessment for Views 12a and 12b, while for View 12c there would be no effect in the cumulative assessment.

It should be noted that the assessments within the Built Heritage and Townscape and Visual Assessments are subjective. City of London Corporation should consider whether adequate justification has been provided for the conclusions of the ES in relation to townscape, visual and heritage effects.

In terms of the ES, LBTH has no objections in relation to the aspects listed, on the

basis that the ES is considered to be adequate by City of London Corporation in accordance with the EIA Regulations 2017 (as amended), and the methodology adopted is appropriate and does not under or overstate the assessment of effects. City of London Corporation must consider whether further information is required in accordance with Regulation 25 of the EIA Regulation.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



**Sripriya Sudhakar, Director Planning and Building Control**



Ms Anastasia Tampouridou  
City of London Corporation  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01580188

20 November 2024

Dear Ms Tampouridou

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

**ALLIANZ HOUSE 60 GRACECHURCH STREET LONDON EC3V 0HR  
Application No. 24/00743/FULEIA**

Thank you for your letter of 23 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**

Historic England is concerned about the harmful impact of the proposals on the significance of St Mary Woolnoth, the Monument and the Tower of London World Heritage Site (WHS).

We have previously advised that such impacts need to be carefully considered, particularly in a scenario when other consented developments are not built. We understand that 55 Gracechurch Street, which was a key consideration in the design of these proposals and the cause of similar harmful impacts, is now no longer a live consent, which changes the baseline.

A Heritage Impact Assessment (HIA) for the WHS has now been submitted. We have some methodological concerns and we do not agree with its conclusions. The proposals would cause some harm to multiple attributes of the Tower's Outstanding Universal Value (OUV) and contribute to a greater harmful cumulative impact.

**Historic England Advice**

We have set out our position on these proposals in detail in our letter of 12 August 2024 and continue to refer you to this advice. A Heritage Impact Assessment for the Tower of London World Heritage Site has been submitted following this advice. In light of this new information we offer the following comments.



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The submitted HIA argues that the Concentric Defences attribute of OUV relates wholly to the physical fabric of the Tower of London. We disagree and consider that setting makes an important contribution to how the defences can be appreciated. The WHS Management Plan notes the visual linkage of the wall-walks with the surrounding cityscape and river as a key component of this attribute.

We think that there would be some harm to this attribute, further to the Tower's Physical Dominance, its appreciation as an Internationally Famous Monument and its Landmark Siting. This harm would arise because of the bulkier and more distracting form of the cluster when seen in relation to the Tower in cross river views. It would also negatively impact views from the Inner Ward of the Tower where it would increase the amount of modern development encroaching on the historic buildings in the foreground.

A further view has been provided in the HIA - south of the Tower on the north riverbank (Figures 6.8 and 6.9). We think that this view demonstrates some further harm. The encroachment of the proposals on the WHS as viewed from this area would harm an appreciation of the Concentric Defences and Landmark Siting attributes of OUV. The proposed building would impinge on the silhouette of St Thomas's Tower, presenting a visually dominating and distracting form.

The updated visualisations in the submitted Heritage Impact Assessment do not include 55 Gracechurch Street in the cumulative scenarios. We understand that this is because the consent is no longer live and is therefore not a material consideration. Whilst our previous advice already considered that the proposals would cause harm to attributes of OUV, the new baseline clarifies the harmful impact. These proposals would contribute further harm to the negative cumulative impact of tall buildings in the cluster, particularly owing to its scale and exposed position at its southern edge.

This development would cause a relatively low level of less than substantial harm in the language of the NPPF, but to an asset of the greatest significance. Furthermore, it would contribute to the erosion of the contribution made by setting to the ability to appreciate the World Heritage Site's attributes of OUV. This contribution is already vulnerable to the cumulative impact of new tall development.

ICOMOS, as adviser to the World Heritage Committee, has previously stated that 'the cumulative effect of existing buildings, planning proposals that are pending and proposals that have received consent but are not yet built is already severe' (Bury House Technical Review, 20/00848/FULEIA) and that 'integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact (Land adjacent to Bury Street Technical Review, 18/01213/FULEIA).

We note that ICOMOS's comments in these cases concerned developments at the eastern edge of the cluster. The impact of the current proposals, at the opposite edge



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of the cluster, would be different, but would contribute to the overall negative cumulative impact of the cluster as described above. We therefore advise that you take ICOMOS's concerns about the overall cumulative impact of the cluster seriously when considering the impact of these proposals. This is particularly important in the in the context of the current heightened international scrutiny regarding the property. UNESCO's World Heritage Centre has recently requested that the UK Government submit a report about the WHS' State of Conservation by 01 December 2024. This request was prompted by concerns about the cumulative effect of tall building development within the Tower of London's setting.

Lastly, we query the materiality of the exposed southern elevation, which would be formed of predominantly metallic cladding comprised of aluminium fins and fascias. This could have a bright reflective quality, even if it has a matt finish. This may not be accurately depicted in the submitted visualisations and we suggest requires careful scrutiny to ensure that the proposed building would not unintentionally leap out from the cluster. This could increase the harmful impacts we have already flagged. As a largely blind façade, we question whether the design quality is sufficient given the prominence it would have.

## **Recommendation**

Historic England has concerns regarding the application on heritage grounds. We recommend that amendments are sought to avoid or minimise the harm to the heritage assets of the highest possible significance, including a reduction in height and review of the materiality of the southern façade.

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention. Historic England would recommend that any decision on this application be deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

In determining this application you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

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.



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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

**Alexander Bowring**

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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